

# Statement of Basis of the Federal Operating Permit

Invista S.à r.l.

Site/Area Name: Utilities

Physical location: Approximately one mile west of the intersection of Farm-to-Market 1686 and State Highway 185, about 8 miles south of Victoria

Nearest City: Victoria

County: Victoria

Permit Number: O1867

Project Type: Minor Revision

Standard Industrial Classification (SIC) Code: 2869

SIC Name: Industrial Organic Chemicals

This Statement of Basis sets forth the legal and factual basis for the draft changes to the permit conditions resulting from the minor revision project in accordance with 30 TAC §122.201(a)(4). The applicant has submitted an application for a minor permit revision per §§ 122.215-217. This document may include the following information:

- A description of the facility/area process description;
- A description of the revision project;
- A basis for applying permit shields;
- A list of the federal regulatory applicability determinations;
- A table listing the determination of applicable requirements;
- A list of the New Source Review Requirements;
- The rationale for periodic monitoring methods selected;
- The rationale for compliance assurance methods selected;
- A compliance status; and
- A list of available unit attribute forms.

Prepared on: February 13, 2015

## **Operating Permit Basis of Determination**

### **Description of Revisions**

Added preconstruction authorization 106.476 in the New Source Authorization References table; added preconstruction authorizations 106.261 & 106.262 to unit 04FLR032; and added preconstruction authorization 106.476 to unit 17TFX004.

### **Permit Area Process Description**

#### **East (Diamine) Powerhouse and West (Adipic) Powerhouse**

The INVISTA Victoria Plant consists of several distinct production units:

- Adipic Acid (AA)
- Dodecanedioic Acid (C12)
- Adiponitrile (ADN)
- Hexamethylene Diamine (HMD)
- Hydrogen (H<sub>2</sub>)
- Nitric Acid (AOP)

Waste streams from these units are sent to the boilers to generate steam at the powerhouses. The liquid and gaseous streams from the AA, C12, AOP, and ADN units are primarily combusted in the West Powerhouse (WPH), though one waste stream from the ADN unit can be fed to the East Powerhouse (EPH) as well. The liquid waste stream from the ADN unit and the liquid and gaseous waste streams from the HMD and H<sub>2</sub> units are the primary fuels for EPH. DuPont and Equistar (previously represented as Lyondell), both operate a facility at the Victoria site. These units send waste streams to the EPH. A small portion of the heat input for each boiler is provided by natural gas fed to the pilots. Additional natural gas is used as supplementary fuel when the boilers' heat input from waste fuel streams is not sufficient.

There are two boilers in the East Powerhouse, Boilers 7 and 8. Boilers 7 and 8 share a common stack (EPN 17STK-007). The nominal steam production capacity of Boilers 7 and 8 is 400,000 lb/hr each.

There are four boilers in the West Powerhouse. Boilers 1 and 2 share a common stack (EPN 15STK-005) and Boilers 3 and 4 share a common stack (EPN 15STK-006). The nominal steam production capacity of Boilers 1 and 2 is 300,000 lb/hr each and the nominal steam production capacity of Boilers 3 and 4 is 400,000 lb/hr each.

### **Cogeneration**

The Cogen Unit has a General Electric Frame 7 turbine that is fired in simple-cycle mode with a heat recovery steam generator (HRSG). The turbine fuel is exclusively pipeline quality natural gas. The gas turbine currently has steam injection into and intermittently downstream of the combustion chamber to control NOX emissions. Hot exhaust gas from the turbine is routed into the HRSG. The HRSG has an unfired, natural circulation design and produces high and low pressure steam that is routed to the plant utility system. The exhaust gas then leaves the HRSG and is exhausted to atmosphere via the Cogen Unit main stack.

In addition to the INVISTA production units, the following companies also operate equipment at the Victoria site: DuPont (Polyethylene) and Equistar Chemicals.

### **FOPs at Site**

The "application area" consists of the emission units and that portion of the site included in the application and this permit. Multiple FOPs may be issued to a site in accordance with 30 TAC § 122.201(e). When there is only

one area for the site, then the application information and permit will include all units at the site. Additional FOPs that exist at the site, if any, are listed below.

Additional FOPs: O1415, O1902, O1904

### Major Source Pollutants

The table below specifies the pollutants for which the site is a major source:

Major Pollutants	VOC, SO <sub>2</sub> , PM, NO <sub>x</sub> , HAPS, CO, GHG
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### Reading State of Texas's Federal Operating Permit

The Title V Federal Operating Permit (FOP) lists all state and federal air emission regulations and New Source Review (NSR) authorizations (collectively known as “applicable requirements”) that apply at a particular site or permit area (in the event a site has multiple FOPs). **The FOP does not authorize new emissions or new construction activities.** The FOP begins with an introductory page which is common to all Title V permits. This page gives the details of the company, states the authority of the issuing agency, requires the company to operate in accordance with this permit and 30 Texas Administrative Code (TAC) Chapter 122, requires adherence with NSR requirements of 30 TAC Chapter 116, and finally indicates the permit number and the issuance date.

This is followed by the table of contents, which is generally composed of the following elements. Not all permits will have all of the elements.

- General Terms and Conditions
- Special Terms and Conditions
  - Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting
  - Additional Monitoring Requirements
  - New Source Review Authorization Requirements
  - Compliance Requirements
  - Protection of Stratosphere Ozone
  - Permit Location
  - Permit Shield (30 TAC § 122.148)
- Attachments
  - Applicable Requirements Summary
    - Unit Summary
    - Applicable Requirements Summary
  - Additional Monitoring Requirements
  - Permit Shield
  - New Source Review Authorization References
  - Compliance Plan
  - Alternative Requirements
- Appendix A
  - Acronym list
- Appendix B
  - Copies of major NSR authorizations

## General Terms and Conditions

The General Terms and Conditions are the same and appear in all permits. The first paragraph lists the specific citations for 30 TAC Chapter 122 requirements that apply to all Title V permit holders. The second paragraph describes the requirements for record retention. The third paragraph provides details for voiding the permit, if applicable. The fourth paragraph states that the permit holder shall comply with the requirements of 30 TAC Chapter 116 by obtaining a New Source Review authorization prior to new construction or modification of emission units located in the area covered by this permit. The fifth paragraph provides details on submission of reports required by the permit.

## Special Terms and Conditions

Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting. The TCEQ has designated certain applicable requirements as site-wide requirements. A site-wide requirement is a requirement that applies uniformly to all the units or activities at the site. Units with only site-wide requirements are addressed on Form OP-REQ1 and are not required to be listed separately on a OP-UA Form or Form OP-SUM. Form OP-SUM must list all units addressed in the application and provide identifying information, applicable OP-UA Forms, and preconstruction authorizations. The various OP-UA Forms provide the characteristics of each unit from which applicable requirements are established. Some exceptions exist as a few units may have both site-wide requirements and unit specific requirements.

Other conditions. The other entries under special terms and conditions are in general terms referring to compliance with the more detailed data listed in the attachments.

## Attachments

Applicable Requirements Summary. The first attachment, the Applicable Requirements Summary, has two tables, addressing unit specific requirements. The first table, the Unit Summary, includes a list of units with applicable requirements, the unit type, the applicable regulation, and the requirement driver. The intent of the requirement driver is to inform the reader that a given unit may have several different operating scenarios and the differences between those operating scenarios.

The applicable requirements summary table provides the detailed citations of the rules that apply to the various units. For each unit and operating scenario, there is an added modifier called the “index number,” detailed citations specifying monitoring and testing requirements, recordkeeping requirements, and reporting requirements. The data for this table are based on data supplied by the applicant on the OP-SUM and various OP-UA forms.

Additional Monitoring Requirement. The next attachment includes additional monitoring the applicant must perform to ensure compliance with the applicable standard. Compliance assurance monitoring (CAM) is often required to provide a reasonable assurance of compliance with applicable emission limitations/standards for large emission units that use control devices to achieve compliance with applicant requirements. When necessary, periodic monitoring (PM) requirements are specified for certain parameters (i.e. feed rates, flow rates, temperature, fuel type and consumption, etc.) to determine if a term and condition or emission unit is operating within specified limits to control emissions. These additional monitoring approaches may be required for two reasons. First, the applicable rules do not adequately specify monitoring requirements (exception- Maximum Achievable Control Technology Standards (MACTs) generally have sufficient monitoring), and second, monitoring may be required to fill gaps in the monitoring requirements of certain applicable requirements. In situations where the NSR permit is the applicable requirement requiring extra monitoring for a specific emission unit, the preferred solution is to have the monitoring requirements in the NSR permit updated so that all NSR requirements are consolidated in the NSR permit.

**Permit Shield.** A permit may or may not have a permit shield, depending on whether an applicant has applied for, and justified the granting of, a permit shield. A permit shield is a special condition included in the permit document stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirement(s) or specified applicable state-only requirement(s).

**New Source Review Authorization References.** All activities which are related to emissions in the state of Texas must have a NSR authorization prior to beginning construction. This section lists all units in the permit and the NSR authorization that allowed the unit to be constructed or modified. Units that do not have unit specific applicable requirements other than the NSR authorization do not need to be listed in this attachment. While NSR permits are not physically a part of the Title V permit, they are legally incorporated into the Title V permit by reference. Those NSR permits whose emissions exceed certain PSD/NA thresholds must also undergo a Federal review of federally regulated pollutants in addition to review for state regulated pollutants.

**Compliance Plan.** A permit may have a compliance schedule attachment for listing corrective actions plans for any emission unit that is out of compliance with an applicable requirement.

**Alternative Requirements.** This attachment will list any alternative monitoring plans or alternative means of compliance for applicable requirements that have been approved by the EPA Administrator and/or the TCEQ Executive Director.

## Appendix A

**Acronym list.** This attachment lists the common acronyms used when discussing the FOPs.

## Appendix B

Copies of major NSR authorizations applicable to the units covered by this permit have been included in this Appendix, to ensure that all interested persons can access those authorizations.

### **Stationary vents subject to 30 TAC Chapter 111, Subchapter A, § 111.111(a)(1)(B) addressed in the Special Terms and Conditions**

The site contains stationary vents with a flowrate less than 100,000 actual cubic feet per minute (acfm) and constructed after January 31, 1972 which are limited, over a six-minute average, to 20% opacity as required by 30 TAC § 111.111(a)(1)(B). As a site may have a large number of stationary vents that fall into this category, they are not required to be listed individually in the permit's Applicable Requirement Summary. This is consistent with EPA's White Paper for Streamlined Development of Part 70 Permit Applications, July 10, 1995, that states that requirements that apply identically to emission units at a site can be treated on a generic basis such as source-wide opacity limits.

Periodic monitoring is specified in Special Term and Condition 3 for stationary vents subject to 30 TAC § 111.111(a)(1)(B) to verify compliance with the 20% opacity limit. These vents are not expected to produce visible emissions during normal operation. The TCEQ evaluated the probability of these sources violating the opacity standards and determined that there is a very low potential that an opacity standard would be exceeded. It was determined that continuous monitoring for these sources is not warranted as there would be very limited environmental benefit in continuously monitoring sources that have a low potential to produce visible emissions. Therefore, the TCEQ set the visible observation monitoring frequency for these sources to once per calendar quarter.

The TCEQ has exempted vents that are not capable of producing visible emissions from periodic monitoring requirements. These vents include sources of colorless VOCs, non-fuming liquids, and other materials that cannot produce emissions that obstruct the transmission of light. Passive ventilation vents, such as plumbing vents, are also included in this category. Since this category of vents are not capable of producing opacity due

to the physical or chemical characteristics of the emission source, periodic monitoring is not required as it would not yield any additional data to assure compliance with the 20% opacity standard of 30 TAC § 111.111(a)(1)(B).

In the event that visible emissions are detected, either through the quarterly observation or other credible evidence, such as observations from company personnel, the permit holder shall either report a deviation or perform a Test Method 9 observation to determine the opacity consistent with the 6-minute averaging time specified in 30 TAC § 111.111(a)(1)(B). An additional provision is included to monitor combustion sources more frequently than quarterly if alternate fuels are burned for periods greater than 24 consecutive hours. This will address possible emissions that may arise when switching fuel types.

### **Stationary Vents subject to 30 TAC Chapter 111 not addressed in the Special Terms and Conditions**

All other stationary vents subject to 30 TAC Chapter 111 not covered in the Special Terms and Conditions are listed in the permit's Applicable Requirement Summary. The basis for the applicability determinations for these vents are listed in the Determination of Applicable Requirements table.

### **Federal Regulatory Applicability Determinations**

The following chart summarizes the applicability of the principal air pollution regulatory programs to the permit area:

<b>Regulatory Program</b>	<b>Applicability (Yes/No)</b>
Prevention of Significant Deterioration (PSD)	Yes
Nonattainment New Source Review (NNSR)	No
Minor NSR	Yes
40 CFR Part 60 - New Source Performance Standards	Yes
40 CFR Part 61 - National Emission Standards for Hazardous Air Pollutants (NESHAPs)	Yes
40 CFR Part 63 - NESHAPs for Source Categories	Yes
Title IV (Acid Rain) of the Clean Air Act (CAA)	No
Title V (Federal Operating Permits) of the CAA	Yes
Title VI (Stratospheric Ozone Protection) of the CAA	Yes
CAIR (Clean Air Interstate Rule)	No

### **Basis for Applying Permit Shields**

An operating permit applicant has the opportunity to specifically request a permit shield to document that specific applicable requirements do not apply to emission units in the permit. A permit shield is a special condition stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirements or specified potentially applicable state-only requirements. A permit shield has been requested in the application for specific emission units. For the permit shield requests that have been approved, the basis of determination for regulations that the owner/operator need not comply with are located in the "Permit Shield" attachment of the permit.

## **Insignificant Activities**

In general, units not meeting the criteria for inclusion on either Form OP-SUM or Form OP-REQ1 are not required to be addressed in the operating permit application. Examples of these types of units include, but are not limited to, the following:

1. Office activities such as photocopying, blueprint copying, and photographic processes.
2. Sanitary sewage collection and treatment facilities other than those used to incinerate wastewater treatment plant sludge. Stacks or vents for sanitary sewer plumbing traps are also included.
3. Food preparation facilities including, but not limited to, restaurants and cafeterias used for preparing food or beverages primarily for consumption on the premises.
4. Outdoor barbecue pits, campfires, and fireplaces.
5. Laundry dryers, extractors, and tumblers processing bedding, clothing, or other fabric items generated primarily at the premises. This does not include emissions from dry cleaning systems using perchloroethylene or petroleum solvents.
6. Facilities storing only dry, sweet natural gas, including natural gas pressure regulator vents.
7. Any air separation or other industrial gas production, storage, or packaging facility. Industrial gases, for purposes of this list, include only oxygen, nitrogen, helium, neon, argon, krypton, and xenon.
8. Storage and handling of sealed portable containers, cylinders, or sealed drums.
9. Vehicle exhaust from maintenance or repair shops.
10. Storage and use of non-VOC products or equipment for maintaining motor vehicles operated at the site (including but not limited to, antifreeze and fuel additives).
11. Air contaminant detectors and recorders, combustion controllers and shut-off devices, product analyzers, laboratory analyzers, continuous emissions monitors, other analyzers and monitors, and emissions associated with sampling activities. Exception to this category includes sampling activities that are deemed fugitive emissions and under a regulatory leak detection and repair program.
12. Bench scale laboratory equipment and laboratory equipment used exclusively for chemical and physical analysis, including but not limited to, assorted vacuum producing devices and laboratory fume hoods.
13. Steam vents, steam leaks, and steam safety relief valves, provided the steam (or boiler feedwater) has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
14. Storage of water that has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
15. Well cellars.
16. Fire or emergency response equipment and training, including but not limited to, use of fire control equipment including equipment testing and training, and open burning of materials or fuels associated with firefighting training.
17. Crucible or pot furnaces with a brim full capacity of less than 450 cubic inches of any molten metal.
18. Equipment used exclusively for the melting or application of wax.
19. All closed tumblers used for the cleaning or deburring of metal products without abrasive blasting, and all open tumblers with a batch capacity of 1,000 lbs. or less.
20. Shell core and shell mold manufacturing machines.
21. Sand or investment molds with a capacity of 100 lbs. or less used for the casting of metals;
22. Equipment used for inspection of metal products.
23. Equipment used exclusively for rolling, forging, pressing, drawing, spinning, or extruding either hot or cold metals by some mechanical means.
24. Instrument systems utilizing air, natural gas, nitrogen, oxygen, carbon dioxide, helium, neon, argon, krypton, and xenon.
25. Battery recharging areas.
26. Brazing, soldering, or welding equipment.

## **Determination of Applicable Requirements**

The tables below include the applicability determinations for the emission units, the index number(s) where applicable, and all relevant unit attribute information used to form the basis of the applicability determination. The unit attribute information is a description of the physical properties of an emission unit which is used to determine the requirements to which the permit holder must comply. For more information about the descriptions of the unit attributes specific Unit Attribute Forms may be viewed at [www.tceq.texas.gov/permitting/air/nav/air\\_all\\_ua\\_forms.html](http://www.tceq.texas.gov/permitting/air/nav/air_all_ua_forms.html).

A list of unit attribute forms is included at the end of this document. Some examples of unit attributes include construction date; product stored in a tank; boiler fuel type; etc.. Generally, multiple attributes are needed to determine the requirements for a given emission unit and index number. The table below lists these attributes in the column entitled "Basis of Determination." Attributes that demonstrate that an applicable requirement applies will be the factual basis for the specific citations in an applicable requirement that apply to a unit for that index number. The TCEQ Air Permits Division has developed flowcharts for determining applicability of state and federal regulations based on the unit attribute information in a Decision Support System (DSS). These flowcharts can be accessed via the internet at [www.tceq.texas.gov/permitting/air/nav/air\\_supportsys.html](http://www.tceq.texas.gov/permitting/air/nav/air_supportsys.html). The Air Permits Division staff may also be contacted for assistance at (512) 239-1250.

The attributes for each unit and corresponding index number provide the basis for determining the specific legal citations in an applicable requirement that apply, including emission limitations or standards, monitoring, recordkeeping, and reporting. The rules were found to apply or not apply by using the unit attributes as answers to decision questions found in the flowcharts of the DSS. Some additional attributes indicate which legal citations of a rule apply. The legal citations that apply to each emission unit may be found in the Applicable Requirements Summary table of the draft permit. There may be some entries or rows of units and rules not found in the permit, or if the permit contains a permit shield, repeated in the permit shield area. These are sets of attributes that describe negative applicability, or; in other words, the reason why a potentially applicable requirement does not apply.

If applicability determinations have been made which differ from the available flowcharts, an explanation of the decisions involved in the applicability determination is specified in the column "Changes and Exceptions to RRT." If there were no exceptions to the DSS, then this column has been removed.

The draft permit includes all emission limitations or standards, monitoring, recordkeeping and reporting required by each applicable requirement. If an applicable requirement does not require monitoring, recordkeeping, or reporting, the word "None" will appear in the Applicable Requirements Summary table. If additional periodic monitoring is required for an applicable requirement, it will be explained in detail in the portion of this document entitled "Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected."

When attributes demonstrate that a unit is not subject to an applicable requirement, the applicant may request a permit shield for those items. The portion of this document entitled "Basis for Applying Permit Shields" specifies which units, if any, have a permit shield.

### **Operational Flexibility**

When an emission unit has multiple operating scenarios, it will have a different index number associated with each operating condition. This means that units are permitted to operate under multiple operating conditions. The applicable requirements for each operating condition are determined by a unique set of unit attributes. For example, a tank may store two different products at different points in time. The tank may, therefore, need to comply with two distinct sets of requirements, depending on the product that is stored. Both sets of requirements are included in the permit, so that the permit holder may store either product in the tank.



## Determination of Applicable Requirements

Unit ID	Regulation	Index Number	Basis of Determination *
17ENG001	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-1	Brake HP = Stationary RICE with a brake hp greater than 500. Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002.
12TFX026	30 TAC Chapter 115, Storage of VOCs	R5112-1	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Product Stored = Crude oil and/or condensate Storage Capacity = Capacity is less than or equal to 1,000 gallons
12TFX026	40 CFR Part 60, Subpart Ka	60Ka-1	Product Stored = Stored product other than a petroleum liquid
12TFX026	40 CFR Part 60, Subpart Kb	60Kb-1	Product Stored = Volatile organic liquid Storage Capacity = Capacity is less than 10,600 gallons (40,000 liters)
14TFX516	30 TAC Chapter 115, Storage of VOCs	R5112	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank does not require emission controls True Vapor Pressure = True vapor pressure is greater than or equal to 1.0 psia but less than 1.5 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons
15TFX021	30 TAC Chapter 115, Storage of VOCs	R5112-1	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank does not require emission controls True Vapor Pressure = True vapor pressure is less than 1.0 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons
15TFX023	30 TAC Chapter 115, Storage of VOCs	R5112-2	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is less than or equal to 1,000 gallons
15TFX025	30 TAC Chapter 115, Storage of VOCs	R5112-2	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is less than or equal to 1,000 gallons

Unit ID	Regulation	Index Number	Basis of Determination*
17TFX004	30 TAC Chapter 115, Storage of VOCs	R5112-1	<p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank does not require emission controls</p> <p>True Vapor Pressure = True vapor pressure is less than 1.0 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons</p>
17TFX004	40 CFR Part 61, Subpart FF	61FF-4	<p>Bypass Line = The closed vent system contains any by-pass line that could divert the vent stream away from the control device.</p> <p>Tank Control Requirements = The tank has a fixed roof and closed vent system routing vapors to either a fuel gas system or control device.</p> <p>Waste Treatment Tank = The tank manages, treats or stores a waste stream subject to 40 CFR Part 61, Subpart FF.</p> <p>Alternative Standard for Tanks = The tank is not complying with the alternative standards in 40 CFR § 61.351.</p> <p>Bypass Line Valve = A car-seal or lock and key configuration are used to secure the by-pass line valve in the closed position.</p> <p>Fuel Gas System = Gaseous emissions from the tank or enclosure are not routed to a fuel gas system.</p> <p>Closed Vent System and Control Device = A closed vent system and control device is used.</p> <p>Control Device Type/Operations = Flare</p> <p>Cover and Closed Vent = The cover and closed vent system are not operated such that the tank is maintained at a pressure less than atmospheric pressure and meets the conditions of 40 CFR § 61.343(a)(1)(i)(C)(1) - (3).</p> <p>Closed Vent System and Control Device AMOC = Not using an alternate means of compliance</p> <p>Alternative Means of Compliance = Not using an alternate means of compliance to meet the requirements of 40 CFR § 61.343 for tanks.</p>
17TFX008	30 TAC Chapter 115, Storage of VOCs	R5112-2	<p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank using a vapor recovery system (VRS)</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons</p> <p>Control Device Type = Flare</p>
17TFX008	40 CFR Part 61, Subpart FF	61FF-4	<p>Bypass Line = The closed vent system contains any by-pass line that could divert the vent stream away from the control device.</p> <p>Tank Control Requirements = The tank has a fixed roof and closed vent system routing vapors to either a fuel gas system or control device.</p> <p>Waste Treatment Tank = The tank manages, treats or stores a waste stream subject to 40 CFR Part 61, Subpart FF.</p> <p>Alternative Standard for Tanks = The tank is not complying with the alternative standards in 40 CFR § 61.351.</p> <p>Bypass Line Valve = A car-seal or lock and key configuration are used to secure the by-pass line valve in the closed position.</p> <p>Fuel Gas System = Gaseous emissions from the tank or enclosure are not routed to a fuel gas system.</p> <p>Closed Vent System and Control Device = A closed vent system and control device is used.</p> <p>Control Device Type/Operations = Flare</p> <p>Cover and Closed Vent = The cover and closed vent system are not operated such that the tank is maintained at a pressure less than atmospheric pressure and meets the conditions of 40 CFR § 61.343(a)(1)(i)(C)(1) - (3).</p> <p>Closed Vent System and Control Device AMOC = Not using an alternate means of compliance</p> <p>Alternative Means of Compliance = Not using an alternate means of compliance to meet the requirements of 40 CFR § 61.343 for tanks.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
17TFX008	40 CFR Part 63, Subpart DD	63DD-8	Subject to Another Subpart of Part 61 or 63 = The tank is subject to another subpart under 40 CFR Part 61 or Part 63, and the owner or operator is controlling the HAP listed in Table 1 of 40 CFR Part 63, Subpart DD that are emitted in compliance with the provisions of the other subpart.
17TFX009	30 TAC Chapter 115, Storage of VOCs	R5112-2	<p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank using a vapor recovery system (VRS)</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons</p> <p>Control Device Type = Flare</p>
17TFX009	40 CFR Part 63, Subpart DD	63DD-9	<p>Bulk Feed = The tank is not used for bulk feed of off-site material to a waste incinerator.</p> <p>No Detectable Organic Emissions = The closed vent system routing to the control device is designed to operate with no detectable organic emissions, as specified in 40 CFR § 63.694(k).</p> <p>Subject to Another Subpart of Part 61 or 63 = The tank is not subject to another subpart under 40 CFR Part 61 or 40 CFR Part 63.</p> <p>Control Device = Flare</p> <p>Existing Source = The tank is part of an existing source managing off-site material.</p> <p>HAP &lt;1 Mg/Year = The owner or operator is choosing to exempt the tank from the requirements specified in 40 CFR § 63.683(b)(1).</p> <p>Numerical Concentration Limits = The off-site material placed in the tank is not a hazardous waste that meets the numerical concentration limits, applicable to the hazardous waste, as specified in 40 CFR Part 268, Land Disposal Restrictions.</p> <p>Tank Emissions Control = Tank is not used to manage off-site material having a maximum organic vapor pressure that is greater than or equal to 76.6 kPa, is not used for a waste stabilization process and is required to use Tank Level 1 controls as specified by Table 3.</p> <p>Level 2 Controls = As an alternative to meeting 40 CFR § 63.685(c)(2)(i), air emissions from the tank are controlled in accordance with Level 2 controls specified in 40 CFR § 63.685(d).</p> <p>Treated Organic Hazardous Constituents = Organic hazardous constituents in the hazardous waste have not been treated according to 40 CFR § 268.42(a), nor removed or destroyed by an equivalent method of treatment approved under 40 CFR § 268.42(b).</p> <p>Air Emission Controls = The owner or operator is opting to install and operate air emission controls on the tank in accordance with the standards specified in 40 CFR § 63.685.</p> <p>Tank Type = A tank vented through a closed vent system to a control device</p> <p>Biological Treatment = The tank is not used for a biological treatment process that meets the requirements in either 40 CFR § 63.683(b)(2)(iii)(A) or (B).</p> <p>Inspected and Monitored = The closed vent system is inspected and monitored as specified in 40 CFR § 63.693(b)(4)(i).</p> <p>Bypass Device = The closed vent system routing to the control device includes by-pass devices that could be used to divert the gas or vapor stream to the atmosphere before entering the control device.</p> <p>Flow Meter = The by-pass device is equipped with a seal or locking device.</p> <p>Design Analysis = Design analysis is used to demonstrate control device performance.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
17TFX011	30 TAC Chapter 115, Storage of VOCs	R5112-1	<p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank does not require emission controls</p> <p>True Vapor Pressure = True vapor pressure is less than 1.0 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 25,000 gallons but less than or equal to 40,000 gallons</p>
17TFX011	40 CFR Part 60, Subpart Kb	60Kb-1	<p>Product Stored = Volatile organic liquid</p> <p>Storage Capacity = Capacity is greater than or equal to 19,800 gallons (75,000 liters) but less than 39,900 gallons (151,000 liters)</p> <p>Maximum True Vapor Pressure = True vapor pressure is less than 2.2 psia</p>
17TFX012	30 TAC Chapter 115, Storage of VOCs	R5112-1	<p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank does not require emission controls</p> <p>True Vapor Pressure = True vapor pressure is less than 1.0 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 25,000 gallons but less than or equal to 40,000 gallons</p>
17TFX012	40 CFR Part 60, Subpart Kb	60Kb-1	<p>Product Stored = Volatile organic liquid</p> <p>Storage Capacity = Capacity is greater than or equal to 19,800 gallons (75,000 liters) but less than 39,900 gallons (151,000 liters)</p> <p>Maximum True Vapor Pressure = True vapor pressure is less than 2.2 psia</p>
17TFX547	30 TAC Chapter 115, Storage of VOCs	R5112-1	<p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank using a submerged fill pipe</p> <p>True Vapor Pressure = True vapor pressure is less than 1.0 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 40,000 gallons</p>
17TFX547	40 CFR Part 60, Subpart Kb	60Kb-1	<p>Product Stored = Waste mixture of indeterminate or variable composition</p> <p>Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters)</p> <p>Maximum True Vapor Pressure = True vapor pressure is less than 0.5 psia</p>
17TFX548	30 TAC Chapter 115, Storage of VOCs	R5112-1	<p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank using a submerged fill pipe</p> <p>True Vapor Pressure = True vapor pressure is less than 1.0 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 40,000 gallons</p>
17TFX548	40 CFR Part 60, Subpart Kb	60Kb-1	<p>Product Stored = Waste mixture of indeterminate or variable composition</p> <p>Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters)</p> <p>Maximum True Vapor Pressure = True vapor pressure is less than 0.5 psia</p>

Unit ID	Regulation	Index Number	Basis of Determination*
17LTR010	30 TAC Chapter 115, Loading and Unloading of VOC	R5212-1	Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal. Alternate Control Requirement (ACR) = No alternate control requirements are being utilized. Product Transferred = Volatile organic compounds other than liquefied petroleum gas, crude oil, condensate and gasoline. Transfer Type = Only unloading. True Vapor Pressure = True vapor pressure is less than 1.5 psia.
15BLR001	40 CFR Part 60, Subpart D	60D-1	Construction/Modification Date = On or before August 17, 1971.
15BLR001	40 CFR Part 63, Subpart EEE	63EEE-1	ALT Metals = Complying with the particulate matter standards. Type Fuel = Boiler burns liquid fuel. Existing Source = The boiler is an existing source (construction or reconstruction commenced on or before April 20, 2004). Met Feedrate = Feedrate levels are established as 12-hour rolling average limit for semivolatile and low volatile metals. Area Source = The boiler is a major source as defined under §63.2. CO/THC Standard = Complying with the CO standard in § 63.1216(a)(5)(i) or (b)(5)(i); or § 63.1217(a)(5)(i) or (b)(5)(i). Baghouse = The boiler is not equipped with a baghouse. Elective Standards = The area source is electing to comply with § 63.1216 or § 63.1217 per § 266.100(b)(3). Dioxin/Furan Standard = Complying with the CO standard in § 63.1217(a)(1)(ii) or (b)(1)(ii). PM Detection = A bag leak detection system is used. Dioxin-Listed = The boiler does not burn the dioxin-listed hazardous wastes F020, F021, F022, F023, F026, or F027. Heating Value = The hazardous waste as-fired heating value is 10,000 Btu/lb or greater. DRE Previous Test = Previous testing was used to document conformance with the DRE standard. Hg Feedrate = Feedrate levels are established as 12-hour rolling average limit for Hg. Feed Zone = The source feeds waste at the normal flame zone.
15BLR001	40 CFR Part 63, Subpart EEE	63EEE-2	ALT Metals = Complying with the particulate matter standards. Type Fuel = Boiler burns liquid fuel. Existing Source = The boiler is an existing source (construction or reconstruction commenced on or before April 20, 2004). Met Feedrate = Feedrate levels are established as 12-hour rolling average limit for semivolatile and low volatile metals. Area Source = The boiler is a major source as defined under §63.2. CO/THC Standard = Complying with the CO standard in § 63.1216(a)(5)(i) or (b)(5)(i); or § 63.1217(a)(5)(i) or (b)(5)(i). Baghouse = The boiler is not equipped with a baghouse. Elective Standards = The area source is electing to comply with § 63.1216 or § 63.1217 per § 266.100(b)(3). Dioxin/Furan Standard = Complying with the CO standard in § 63.1217(a)(1)(ii) or (b)(1)(ii). PM Detection = A bag leak detection system is used. Dioxin-Listed = The boiler does not burn the dioxin-listed hazardous wastes F020, F021, F022, F023, F026, or F027. Heating Value = The hazardous waste as-fired heating value is less than 10,000 Btu/lb. DRE Previous Test = Previous testing was used to document conformance with the DRE standard.

Unit ID	Regulation	Index Number	Basis of Determination*
			Hg Feedrate = Feedrate levels are established as 12-hour rolling average limit for Hg. Feed Zone = The source feeds waste at the normal flame zone.
15BLR002	40 CFR Part 60, Subpart D	60D-1	Construction/Modification Date = On or before August 17, 1971.
15BLR002	40 CFR Part 63, Subpart EEE	63EEE-1	<p>ALT Metals = Complying with the particulate matter standards.</p> <p>Type Fuel = Boiler burns liquid fuel.</p> <p>Existing Source = The boiler is an existing source (construction or reconstruction commenced on or before April 20, 2004).</p> <p>Met Feedrate = Feedrate levels are established as 12-hour rolling average limit for semivolatile and low volatile metals.</p> <p>Area Source = The boiler is a major source as defined under §63.2.</p> <p>CO/THC Standard = Complying with the CO standard in § 63.1216(a)(5)(i) or (b)(5)(i); or § 63.1217(a)(5)(i) or (b)(5)(i).</p> <p>Baghouse = The boiler is not equipped with a baghouse.</p> <p>Elective Standards = The area source is electing to comply with § 63.1216 or § 63.1217 per § 266.100(b)(3).</p> <p>Dioxin/Furan Standard = Complying with the CO standard in § 63.1217(a)(1)(ii) or (b)(1)(ii).</p> <p>PM Detection = A bag leak detection system is used.</p> <p>Dioxin-Listed = The boiler does not burn the dioxin-listed hazardous wastes F020, F021, F022, F023, F026, or F027.</p> <p>Heating Value = The hazardous waste as-fired heating value is 10,000 Btu/lb or greater.</p> <p>DRE Previous Test = Previous testing was used to document conformance with the DRE standard.</p> <p>Hg Feedrate = Feedrate levels are established as 12-hour rolling average limit for Hg.</p> <p>Feed Zone = The source feeds waste at the normal flame zone.</p>
15BLR002	40 CFR Part 63, Subpart EEE	63EEE-2	<p>ALT Metals = Complying with the particulate matter standards.</p> <p>Type Fuel = Boiler burns liquid fuel.</p> <p>Existing Source = The boiler is an existing source (construction or reconstruction commenced on or before April 20, 2004).</p> <p>Met Feedrate = Feedrate levels are established as 12-hour rolling average limit for semivolatile and low volatile metals.</p> <p>Area Source = The boiler is a major source as defined under §63.2.</p> <p>CO/THC Standard = Complying with the CO standard in § 63.1216(a)(5)(i) or (b)(5)(i); or § 63.1217(a)(5)(i) or (b)(5)(i).</p> <p>Baghouse = The boiler is not equipped with a baghouse.</p> <p>Elective Standards = The area source is electing to comply with § 63.1216 or § 63.1217 per § 266.100(b)(3).</p> <p>Dioxin/Furan Standard = Complying with the CO standard in § 63.1217(a)(1)(ii) or (b)(1)(ii).</p> <p>PM Detection = A bag leak detection system is used.</p> <p>Dioxin-Listed = The boiler does not burn the dioxin-listed hazardous wastes F020, F021, F022, F023, F026, or F027.</p> <p>Heating Value = The hazardous waste as-fired heating value is less than 10,000 Btu/lb.</p> <p>DRE Previous Test = Previous testing was used to document conformance with the DRE standard.</p> <p>Hg Feedrate = Feedrate levels are established as 12-hour rolling average limit for Hg.</p> <p>Feed Zone = The source feeds waste at the normal flame zone.</p>
15BLR003	40 CFR Part 60, Subpart D	60D-1	Construction/Modification Date = On or before August 17, 1971.

Unit ID	Regulation	Index Number	Basis of Determination*
15BLR003	40 CFR Part 63, Subpart EEE	63EEE-1	<p>ALT Metals = Complying with the particulate matter standards.</p> <p>Type Fuel = Boiler burns liquid fuel.</p> <p>Existing Source = The boiler is an existing source (construction or reconstruction commenced on or before April 20, 2004).</p> <p>Met Feedrate = Feedrate levels are established as 12-hour rolling average limit for semivolatile and low volatile metals.</p> <p>Area Source = The boiler is a major source as defined under §63.2.</p> <p>CO/THC Standard = Complying with the CO standard in § 63.1216(a)(5)(i) or (b)(5)(i); or § 63.1217(a)(5)(i) or (b)(5)(i).</p> <p>Baghouse = The boiler is not equipped with a baghouse.</p> <p>Elective Standards = The area source is electing to comply with § 63.1216 or § 63.1217 per § 266.100(b)(3).</p> <p>Dioxin/Furan Standard = Complying with the CO standard in § 63.1217(a)(1)(ii) or (b)(1)(ii).</p> <p>PM Detection = A bag leak detection system is used.</p> <p>Dioxin-Listed = The boiler does not burn the dioxin-listed hazardous wastes F020, F021, F022, F023, F026, or F027.</p> <p>Heating Value = The hazardous waste as-fired heating value is 10,000 Btu/lb or greater.</p> <p>DRE Previous Test = Previous testing was used to document conformance with the DRE standard.</p> <p>Hg Feedrate = Feedrate levels are established as 12-hour rolling average limit for Hg.</p> <p>Feed Zone = The source feeds waste at the normal flame zone.</p>
15BLR003	40 CFR Part 63, Subpart EEE	63EEE-2	<p>ALT Metals = Complying with the particulate matter standards.</p> <p>Type Fuel = Boiler burns liquid fuel.</p> <p>Existing Source = The boiler is an existing source (construction or reconstruction commenced on or before April 20, 2004).</p> <p>Met Feedrate = Feedrate levels are established as 12-hour rolling average limit for semivolatile and low volatile metals.</p> <p>Area Source = The boiler is a major source as defined under §63.2.</p> <p>CO/THC Standard = Complying with the CO standard in § 63.1216(a)(5)(i) or (b)(5)(i); or § 63.1217(a)(5)(i) or (b)(5)(i).</p> <p>Baghouse = The boiler is not equipped with a baghouse.</p> <p>Elective Standards = The area source is electing to comply with § 63.1216 or § 63.1217 per § 266.100(b)(3).</p> <p>Dioxin/Furan Standard = Complying with the CO standard in § 63.1217(a)(1)(ii) or (b)(1)(ii).</p> <p>PM Detection = A bag leak detection system is used.</p> <p>Dioxin-Listed = The boiler does not burn the dioxin-listed hazardous wastes F020, F021, F022, F023, F026, or F027.</p> <p>Heating Value = The hazardous waste as-fired heating value is less than 10,000 Btu/lb.</p> <p>DRE Previous Test = Previous testing was used to document conformance with the DRE standard.</p> <p>Hg Feedrate = Feedrate levels are established as 12-hour rolling average limit for Hg.</p> <p>Feed Zone = The source feeds waste at the normal flame zone.</p>
15BLR004	40 CFR Part 60, Subpart D	60D-1	<p>Construction/Modification Date = After August 17, 1971, and on or before December 22, 1976.</p> <p>D-Series Fuel Type #1 = Gaseous fossil fuel.</p> <p>Covered Under Subpart Da = The steam generating unit is not covered under 40 CFR Part 60, Subpart Da.</p> <p>D-Series Fuel Type #2 = Nonfossil fuel.</p> <p>Changes to Existing Affected Facility = No change has been made to the existing fossil fuel-fired steam generating unit.</p> <p>Alternate 43D = No alternative requirement is used for SO<sub>2</sub>, unit is complying with requirements of § 60.43(a) and (b).</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>Heat Input Rate = Heat input rate is greater than 250 MMBtu/hr (73 MW).</p> <p>Alternate 42C = The facility is meeting the requirements of § 60.42(a) for PM.</p> <p>Alternate 44E = The facility is meeting the requirements of § 60.44(a), (b), and (d) for NO<sub>x</sub>.</p> <p>Flue Gas Desulfurization = The unit does not utilize a flue gas desulfurization device.</p> <p>PM CEMS = The facility does not use a CEMS to measure PM.</p> <p>Fuel Sampling and Analysis = The unit uses fuel sampling and analysis for monitoring of sulfur dioxide emissions.</p> <p>Gas or Liquid Fuel Only = Burns gaseous or liquid fossil fuel with potential SO<sub>2</sub> emissions rates greater than 0.060 lb/MMBtu, or other fuels, or uses post combustion technology to reduce of SO<sub>2</sub> or PM, or does not monitor SO<sub>2</sub> emissions by sampling or fuel receipts.</p> <p>Cyclone-Fired Unit = The unit is not a cyclone-fired unit.</p> <p>Fuels with 0.33 Percent or Less Sulfur = Facility uses post combustion technology (except a wet scrubber) for reducing PM, SO<sub>2</sub>, or CO, burns gaseous fuels or fuel oils that contain more than 0.30 % sulfur by weight or other fuels, or operates so CO emissions are &gt; 0.15 lb/MMBtu average.</p> <p>NO<sub>x</sub> Monitoring Type = It was not demonstrated during the performance test that emissions of NO<sub>x</sub> are less than 70% of applicable standards in 40 CFR § 60.44.</p> <p>PM CEMS Petition = No petition has been granted to install a PM CEMS as an alternative to the CEMS for monitoring opacity emissions.</p>
15BLR004	40 CFR Part 63, Subpart EEE	63EEE-1	<p>ALT Metals = Complying with the particulate matter standards.</p> <p>Type Fuel = Boiler burns liquid fuel.</p> <p>Existing Source = The boiler is an existing source (construction or reconstruction commenced on or before April 20, 2004).</p> <p>Met Feedrate = Feedrate levels are established as 12-hour rolling average limit for semivolatile and low volatile metals.</p> <p>Area Source = The boiler is a major source as defined under §63.2.</p> <p>CO/THC Stadar = Complying with the CO standard in § 63.1216(a)(5)(i) or (b)(5)(i); or § 63.1217(a)(5)(i) or (b)(5)(i).</p> <p>Baghouse = The boiler is not equipped with a baghouse.</p> <p>Elective Standards = The area source is electing to comply with § 63.1216 or § 63.1217 per § 266.100(b)(3).</p> <p>Dioxin/Furan Standard = Complying with the CO standard in § 63.1217(a)(1)(ii) or (b)(1)(ii).</p> <p>PM Detection = A bag leak detection system is used.</p> <p>Dioxin-Listed = The boiler does not burn the dioxin-listed hazardous wastes F020, F021, F022, F023, F026, or F027.</p> <p>Heating Value = The hazardous waste as-fired heating value is 10,000 Btu/lb or greater.</p> <p>DRE Previous Test = Previous testing was used to document conformance with the DRE standard.</p> <p>Hg Feedrate = Feedrate levels are established as 12-hour rolling average limit for Hg.</p> <p>Feed Zone = The source feeds waste at the normal flame zone.</p>
15BLR004	40 CFR Part 63, Subpart EEE	63EEE-2	<p>ALT Metals = Complying with the particulate matter standards.</p> <p>Type Fuel = Boiler burns liquid fuel.</p> <p>Existing Source = The boiler is an existing source (construction or reconstruction commenced on or before April 20, 2004).</p> <p>Met Feedrate = Feedrate levels are established as 12-hour rolling average limit for semivolatile and low volatile metals.</p> <p>Area Source = The boiler is a major source as defined under §63.2.</p> <p>CO/THC Stadar = Complying with the CO standard in § 63.1216(a)(5)(i) or (b)(5)(i); or § 63.1217(a)(5)(i) or (b)(5)(i).</p> <p>Baghouse = The boiler is not equipped with a baghouse.</p> <p>Elective Standards = The area source is electing to comply with § 63.1216 or § 63.1217 per § 266.100(b)(3).</p>



Unit ID	Regulation	Index Number	Basis of Determination*
			<p>Dioxin/Furan Standard = Complying with the CO standard in § 63.1217(a)(1)(ii) or (b)(1)(ii).</p> <p>PM Detection = A bag leak detection system is used.</p> <p>Dioxin-Listed = The boiler does not burn the dioxin-listed hazardous wastes F020, F021, F022, F023, F026, or F027.</p> <p>Heating Value = The hazardous waste as-fired heating value is less than 10,000 Btu/lb.</p> <p>DRE Previous Test = Previous testing was used to document conformance with the DRE standard.</p> <p>Hg Feedrate = Feedrate levels are established as 12-hour rolling average limit for Hg.</p> <p>Feed Zone = The source feeds waste at the normal flame zone.</p>
17BLR007	40 CFR Part 60, Subpart D	60D-1	<p>Construction/Modification Date = After August 17, 1971, and on or before December 22, 1976.</p> <p>D-Series Fuel Type #1 = Gaseous fossil fuel.</p> <p>Covered Under Subpart Da = The steam generating unit is not covered under 40 CFR Part 60, Subpart Da.</p> <p>D-Series Fuel Type #2 = Nonfossil fuel.</p> <p>Changes to Existing Affected Facility = No change has been made to the existing fossil fuel-fired steam generating unit.</p> <p>Alternate 43D = No alternative requirement is used for SO<sub>2</sub>, unit is complying with requirements of § 60.43(a) and (b).</p> <p>Heat Input Rate = Heat input rate is greater than 250 MMBtu/hr (73 MW).</p> <p>Alternate 42C = The facility is meeting the requirements of § 60.42(a) for PM.</p> <p>Alternate 44E = The facility is meeting the requirements of § 60.44(a), (b), and (d) for NO<sub>x</sub>.</p> <p>Flue Gas Desulfurization = The unit does not utilize a flue gas desulfurization device.</p> <p>PM CEMS = The facility does not use a CEMS to measure PM.</p> <p>Fuel Sampling and Analysis = The unit uses fuel sampling and analysis for monitoring of sulfur dioxide emissions.</p> <p>Gas or Liquid Fuel Only = Burns gaseous or liquid fossil fuel with potential SO<sub>2</sub> emissions rates greater than 0.060 lb/MMBtu, or other fuels, or uses post combustion technology to reduce of SO<sub>2</sub> or PM, or does not monitor SO<sub>2</sub> emissions by sampling or fuel receipts.</p> <p>Cyclone-Fired Unit = The unit is not a cyclone-fired unit.</p> <p>Fuels with 0.33 Percent or Less Sulfur = Facility uses post combustion technology (except a wet scrubber) for reducing PM, SO<sub>2</sub>, or CO, burns gaseous fuels or fuel oils that contain more than 0.30 % sulfur by weight or other fuels, or operates so CO emissions are &gt; 0.15 lb/MMBtu average.</p> <p>NO<sub>x</sub> Monitoring Type = It was demonstrated during the performance test that emissions of NO<sub>x</sub> are less than 70% of applicable standards in 40 CFR § 60.44.</p> <p>PM CEMS Petition = No petition has been granted to install a PM CEMS as an alternative to the CEMS for monitoring opacity emissions.</p>
17BLR007	40 CFR Part 63, Subpart EEE	63EEE-1	<p>ALT Metals = Complying with the particulate matter standards.</p> <p>Type Fuel = Boiler burns liquid fuel.</p> <p>Existing Source = The boiler is an existing source (construction or reconstruction commenced on or before April 20, 2004).</p> <p>Met Feedrate = Feedrate levels are established as 12-hour rolling average limit for semivolatile and low volatile metals.</p> <p>Area Source = The boiler is a major source as defined under §63.2.</p> <p>CO/THC Stadard = Complying with the CO standard in § 63.1216(a)(5)(i) or (b)(5)(i); or § 63.1217(a)(5)(i) or (b)(5)(i).</p> <p>Baghouse = The boiler is not equipped with a baghouse.</p> <p>Elective Standards = The area source is electing to comply with § 63.1216 or § 63.1217 per § 266.100(b)(3).</p> <p>Dioxin/Furan Standard = Complying with the CO standard in § 63.1217(a)(1)(ii) or (b)(1)(ii).</p> <p>PM Detection = A bag leak detection system is used.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>Dioxin-Listed = The boiler does not burn the dioxin-listed hazardous wastes Fo20, Fo21, Fo22, Fo23, Fo26, or Fo27.</p> <p>Heating Value = The hazardous waste as-fired heating value is 10,000 Btu/lb or greater.</p> <p>DRE Previous Test = Previous testing was used to document conformance with the DRE standard.</p> <p>Hg Feedrate = Feedrate levels are established as 12-hour rolling average limit for Hg.</p> <p>Feed Zone = The source feeds waste at the normal flame zone.</p>
17BLR008	40 CFR Part 60, Subpart D	60D-1	<p>Construction/Modification Date = After August 17, 1971, and on or before December 22, 1976.</p> <p>D-Series Fuel Type #1 = Gaseous fossil fuel.</p> <p>Covered Under Subpart Da = The steam generating unit is not covered under 40 CFR Part 60, Subpart Da.</p> <p>D-Series Fuel Type #2 = Nonfossil fuel.</p> <p>Changes to Existing Affected Facility = No change has been made to the existing fossil fuel-fired steam generating unit.</p> <p>Alternate 43D = No alternative requirement is used for SO<sub>2</sub>, unit is complying with requirements of § 60.43(a) and (b).</p> <p>Heat Input Rate = Heat input rate is greater than 250 MMBtu/hr (73 MW).</p> <p>Alternate 42C = The facility is meeting the requirements of § 60.42(a) for PM.</p> <p>Alternate 44E = The facility is meeting the requirements of § 60.44(a), (b), and (d) for NO<sub>x</sub>.</p> <p>Flue Gas Desulfurization = The unit does not utilize a flue gas desulfurization device.</p> <p>PM CEMS = The facility does not use a CEMS to measure PM.</p> <p>Fuel Sampling and Analysis = The unit uses fuel sampling and analysis for monitoring of sulfur dioxide emissions.</p> <p>Gas or Liquid Fuel Only = Burns gaseous or liquid fossil fuel with potential SO<sub>2</sub> emissions rates greater than 0.060 lb/MMBtu, or other fuels, or uses post combustion technology to reduce of SO<sub>2</sub> or PM, or does not monitor SO<sub>2</sub> emissions by sampling or fuel receipts.</p> <p>Cyclone-Fired Unit = The unit is not a cyclone-fired unit.</p> <p>Fuels with 0.33 Percent or Less Sulfur = Facility uses post combustion technology (except a wet scrubber) for reducing PM, SO<sub>2</sub>, or CO, burns gaseous fuels or fuel oils that contain more than 0.30 % sulfur by weight or other fuels, or operates so CO emissions are &gt; 0.15 lb/MMBtu average.</p> <p>NO<sub>x</sub> Monitoring Type = It was demonstrated during the performance test that emissions of NO<sub>x</sub> are less than 70% of applicable standards in 40 CFR § 60.44.</p> <p>PM CEMS Petition = No petition has been granted to install a PM CEMS as an alternative to the CEMS for monitoring opacity emissions.</p>
17BLR008	40 CFR Part 63, Subpart EEE	63EEE-1	<p>ALT Metals = Complying with the particulate matter standards.</p> <p>Type Fuel = Boiler burns liquid fuel.</p> <p>Existing Source = The boiler is an existing source (construction or reconstruction commenced on or before April 20, 2004).</p> <p>Met Feedrate = Feedrate levels are established as 12-hour rolling average limit for semivolatile and low volatile metals.</p> <p>Area Source = The boiler is a major source as defined under §63.2.</p> <p>CO/THC Stadarnd = Complying with the CO standard in § 63.1216(a)(5)(i) or (b)(5)(i); or § 63.1217(a)(5)(i) or (b)(5)(i).</p> <p>Baghouse = The boiler is not equipped with a baghouse.</p> <p>Elective Standards = The area source is electing to comply with § 63.1216 or § 63.1217 per § 266.100(b)(3).</p> <p>Dioxin/Furan Standard = Complying with the CO standard in § 63.1217(a)(1)(ii) or (b)(1)(ii).</p> <p>PM Detection = A bag leak detection system is used.</p> <p>Dioxin-Listed = The boiler does not burn the dioxin-listed hazardous wastes Fo20, Fo21, Fo22, Fo23, Fo26, or Fo27.</p> <p>Heating Value = The hazardous waste as-fired heating value is 10,000 Btu/lb or greater.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>DRE Previous Test = Previous testing was used to document conformance with the DRE standard.</p> <p>Hg Feedrate = Feedrate levels are established as 12-hour rolling average limit for Hg.</p> <p>Feed Zone = The source feeds waste at the normal flame zone.</p>
04FLR032	30 TAC Chapter 111, Visible Emissions	R1111-1	<p>Acid Gases Only = Flare is not used only as an acid gas flare as defined in 30 TAC § 101.1.</p> <p>Emergency/Upset Conditions Only = Flare is used under conditions other than emergency or upset conditions.</p>
04FLR032	40 CFR Part 60, Subpart A	60A-1	<p>Subject to 40 CFR § 60.18 = Flare is subject to 40 CFR § 60.18.</p> <p>Adhering to Heat Content Specifications = Adhering to the heat content specifications in 40 CFR § 60.18(c)(3)(ii) and the maximum tip velocity specifications in 40 CFR § 60.18(c)(4).</p> <p>Flare Assist Type = Non-assisted</p> <p>Flare Exit Velocity = Flare exit velocity is less than 60 ft/s (18.3 m/sec)</p>
04FLR032	40 CFR Part 63, Subpart A	63A-1	<p>Required Under 40 CFR Part 63 = Flare is required by a Subpart under 40 CFR Part 63.</p> <p>Heat Content Specification = Adhering to the heat content specifications in 40 CFR § 63.11(b)(6)(ii) and the maximum tip velocity specifications in 40 CFR § 63.11(b)(7) or 40 CFR § 63.11(b)(8).</p> <p>Flare Assist Type = Non-assisted</p> <p>Flare Exit Velocity = Flare exit velocity is less than 60 ft/s (18.3 m/sec)</p>
12FLR001	30 TAC Chapter 111, Visible Emissions	R1111-1	<p>Acid Gases Only = Flare is not used only as an acid gas flare as defined in 30 TAC § 101.1.</p> <p>Emergency/Upset Conditions Only = Flare is used under conditions other than emergency or upset conditions.</p>
12FLR001	40 CFR Part 60, Subpart A	60A-1	<p>Subject to 40 CFR § 60.18 = Flare is not subject to 40 CFR § 60.18.</p>
12FLR001	40 CFR Part 63, Subpart A	63A-2	<p>Required Under 40 CFR Part 63 = Flare is not required by a Subpart under 40 CFR Part 63.</p>
14FLR001A	30 TAC Chapter 111, Visible Emissions	R1111-1	<p>Acid Gases Only = Flare is not used only as an acid gas flare as defined in 30 TAC § 101.1.</p> <p>Emergency/Upset Conditions Only = Flare is used under conditions other than emergency or upset conditions.</p> <p>Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.</p>
14FLR001A	40 CFR Part 60, Subpart A	6061A	<p>Subject to 40 CFR § 60.18 = Flare is subject to 40 CFR § 60.18.</p> <p>Adhering to Heat Content Specifications = Adhering to the heat content specifications in 40 CFR § 60.18(c)(3)(ii) and the maximum tip velocity specifications in 40 CFR § 60.18(c)(4).</p> <p>Flare Assist Type = Non-assisted</p> <p>Flare Exit Velocity = Flare exit velocity is less than 60 ft/s (18.3 m/sec)</p>
14FLR001A	40 CFR Part 63, Subpart A	63A	<p>Required Under 40 CFR Part 63 = Flare is not required by a Subpart under 40 CFR Part 63.</p>
12BLR001	40 CFR Part 60, Subpart GG	60GG-1	<p>Duct Burner = The turbine is part of a combined cycle turbine system not equipped with supplemental heat (duct burner).</p> <p>Peak Load Heat Input = Heat Input is greater than 100 MMBtu/hr (107.2 GJ/hr)</p> <p>Construction/Modification Date = On or after October 3, 1982 and before July 8, 2004.</p> <p>NOx Allowance = The owner or operator is not electing to use a NO<sub>x</sub> allowance in determining emission limits in 40 CFR § 60.332(a).</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>Sulfur Content = Compliance is demonstrated by determining the sulfur content of the fuel.</p> <p>Turbine Cycle = Unit recovers heat from the gas turbine exhaust to heat water or generate steam.</p> <p>Fuel Type Fired = Natural gas meeting the definition in § 60.331(u).</p> <p>Subpart GG Service Type = Type of service other than research and development, emergency, military or electrical utility generation.</p> <p>Fuel Supply = Stationary gas turbine is supplied its fuel without intermediate bulk storage.</p> <p>Fuel Monitoring Schedule = Fuel meets the definition of natural gas in 40 CFR § 60.331(u) and is not monitored.</p> <p>Manufacturer's Rated Base Load = Base load is greater than 30 MW.</p>
12BLR001	40 CFR Part 60, Subpart KKKK	60KKKK-1	<p>Unit Type = Combined Heat and Power Combustion Turbine</p> <p>Construction/Modification Date = Turbine was constructed, reconstructed or modified on or before February 18, 2005.</p>
12BLR001	40 CFR Part 63, Subpart YYYY	63YYYY-1	<p>Construction/Reconstruction Date = Turbine was constructed, modified or reconstructed on or before 1/14/2003.</p> <p>Rate Peak Power Output = Power output rating is one megawatt or greater.</p> <p>Type of Service = Turbine is used in non-emergency service.</p> <p>Fuel Fired = Turbine is fired with natural gas.</p>
15FUG	40 CFR Part 63, Subpart H	63H-ALL	SOP Index No. = Owner/Operator assumes fugitive control requirements for all components in VOC or VHAP service subject to 40 CFR Part 63, Subpart H with no alternated control or control device.
17FUG	40 CFR Part 60, Subpart VV	60VV	Produces Chemicals = DOES NOT PRODUCE ANY CHEMICAL LISTED IN 40 CFR 60.489 AS INTERMEDIATE OR FINAL PRODUCT
17FUG	40 CFR Part 61, Subpart J	61J-1	<p>40 CFR 61 (NESHAP) SUBPART J DESIGN CAPACITY = SITE IS DESIGNED TO PRODUCE OR USE MORE THAN 1,000 MEGAGRAMS OF BENZENE PER YEAR</p> <p>ANY COMPONENT IN BENZENE SERVICE [NESHAP J] = THE FACILITY CONTAINS ANY COMPONENT(S) IN BENZENE SERVICE</p> <p>40 CFR 61 (NESHAP) SUBPART J ALTERNATE MEANS OF EMISSION LIMITATION (AMEL) = NOT USING ALTERNATE MEANS OF EMISSION LIMITATION.</p>
17FUG	40 CFR Part 61, Subpart V	61V-1	<p>ALT MEANS OF EMISSION LIMITATION (AMEL)--OTHER CLOSED VENT SYSTEMS [NESHAP V] = NO</p> <p>CLOSED-VENT SYSTEM (CVS) WITH ENCLOSED COMBUSTION DEVICE [NESHAP V] = NO</p> <p>CLOSED-VENT SYSTEM (CVS) WITH FLARE AS CONTROL DEVICE [NESHAP V] = NO</p> <p>CLOSED-VENT SYSTEM (CVS) WITH VAPOR RECOVERY SYSTEM [NESHAP V] = NO</p> <p>COMPONENT IN VACUUM SERVICE [NESHAP V] = NO</p> <p>COMPRESSORS IN VOLATILE HAZARDOUS AIR POLLUTANT (VHAP) SERVICE [NESHAP V] = NO</p> <p>PRESSURE RELIEF DEVICES (PRD) IN VHAP GAS/VAPOR SERVICE [NESHAP V] = NO</p> <p>PRODUCT ACCUMULATOR VESSELS VOLATILE HAZARDOUS AIR POLLUTANT SVC [NESHAP V] = NO</p> <p>SAMPLING CONNECTION SYSTEMS VOLATILE HAZARDOUS AIR POLLUTANT SVC [NESHAP V] = NO</p> <p>VALVES IN VOLATILE HAZARDOUS AIR POLLUTANT (VHAP) SERVICE [NESHAP V] = YES</p> <p>ALT MEAN EMISSION LIMIT (AMEL)-CVS W/ ENCLOSED COMBUSTION DEVICE [NESHAP V] = NO</p> <p>ALT MEANS EMISSION LIMIT (AMEL)-CLOSED VENT SYSTEM W/ VAPOR RECOVERY [NESHAP V] = NO</p> <p>ALT MEANS EMISSION LIMIT (AMEL)-PRODUCT ACCUMULATOR VESSEL VHAP SVC [NESHAP V] = NO</p> <p>ALT MEANS EMISSION LIMITATION (AMEL)-SAMPLING CONNECTION SYS VHAP SVC [NESHAP V] = NO</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>ALT MEANS OF EMISSION LIMITATION (AMEL)-CLOSED VENT SYSTEM W/ FLARE [NESHAP V] = NO</p> <p>ALTERNATE MEANS EMISSION LIMITATION (AMEL)--PRD GAS/VAPOR VHAP SVC [NESHAP V] = NO</p> <p>ALTERNATE MEANS OF EMISSION LIMITATION (AMEL)--COMPRESSORS VHAP SVC [NESHAP V] = NO</p> <p>ALTERNATE MEANS OF EMISSION LIMITATION (AMEL)--VALVES VHAP SERVICE [NESHAP V] = NO</p> <p>COMPONENT IN VOLATILE HAZARDOUS AIR POLLUTANT (VHAP) SERVICE [NESHAP V] = YES</p> <p>COMPLYING W/ 40 CFR 61.242-11(F)(1)--OTHER CLOSED VENT SYSTEM [NESHAP V] = NO</p> <p>PUMPS IN VOLATILE HAZARDOUS AIR POLLUTANT (VHAP) SERVICE [NESHAP V] = NO</p> <p>ALTERNATE MEANS OF EMISSION LIMITATION (AMEL)--PUMPS VHAP SERVICE [NESHAP V] = NO</p> <p>COMPLYING W/ 40 CFR 61.242-11(C)--CVS W/ ENCLOSED COMBUSTION DEVICE [NESHAP V] = NO</p> <p>COMPLYING W/ 40 CFR 61.242-11(D)--CLOSED VENT SYSTEM W/ FLARE [NESHAP V] = NO</p> <p>COMPLYING W/ 40 CFR 61.242-3--COMPRESSORS VHAP SERVICE [NESHAP V] = NO</p> <p>COMPLYING W/ 40 CFR 61.242-4--PRD GAS/VAPOR VHAP SERVICE [NESHAP V] = NO</p> <p>COMPLYING W/ 40 CFR 61.242-5--SAMPLING CONNECTION SYSTEMS VHAP SVC [NESHAP V] = NO</p> <p>COMPLYING W/ 40 CFR 61.242-7--VALVES VHAP SERVICE [NESHAP V] = YES</p> <p>COMPLYING W/ 40 CFR 61.242-9 -- PRODUCT ACCUMULATOR VESSELS VHAP SVC [NESHAP V] = NO</p> <p>COMPLYING W/ 40 CFR 61.242-11(B)--CVS W/ VAPOR RECOVERY SYSTEM [NESHAP V] = NO</p> <p>FLANGES &amp; OTHER CONNECTORS VOLATILE HAZARDOUS AIR POLLUTANT SVC [NESHAP V] = YES</p> <p>OPEN-ENDED VALVES OR LINES VOLATILE HAZARDOUS AIR POLLUTANT SERVICE [NESHAP V] = NO</p> <p>PRESSURE RELIEF DEVICES (PRD) IN VHAP LIQUID SERVICE [NESHAP V] = NO</p> <p>ALT MEANS EMISSION LIMIT (AMEL)-FLANGES/OTHER CONNECTORS VHAP SVC [NESHAP V] = NO</p> <p>ALT MEANS EMISSION LIMITATION (AMEL)-OPEN-ENDED VALVES/LINES VHAP SVC [NESHAP V] = NO</p> <p>ALTERNATE MEANS EMISSION LIMITATION (AMEL)--PRD LIQUID VHAP SVC [NESHAP V] = NO</p> <p>COMPLYING W/ 40 CFR 61.242-2--PUMPS VHAP SERVICE [NESHAP V] = NO</p> <p>COMPLYING W/ 40 CFR 61.242-6 -- OPEN-ENDED VALVES/LINES VHAP SVC [NESHAP V] = NO</p> <p>COMPLYING W/ 40 CFR 61.242-8--FLANGES/OTHER CONNECTORS VHAP SERVICE [NESHAP V] = YES</p> <p>COMPLYING W/ 40 CFR 61.242-8--PRD LIQUID VHAP SERVICE [NESHAP V] = NO</p>
17FUG	40 CFR Part 63, Subpart H	63H-ALL	<p>SOP Index No. = Owner/Operator assumes fugitive control requirements for all components in VOC or VHAP service subject to 40 CFR Part 63, Subpart H with no alternated control or control device.</p> <p>ANY (CLOSED VENT SYSTEMS) = COMPONENT NOT PRESENT</p>
12BLR001	30 TAC Chapter 111, Visible Emissions	R1111-1	<p>Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.</p> <p>Vent Source = The source of the vent is not a steam generator fired by solid fossil fuel, oil or a mixture of oil and gas and is not a catalyst regenerator for a fluid bed catalytic cracking unit.</p> <p>Opacity Monitoring System = Optical instrument capable of measuring the opacity of emissions is not installed in the vent or optical instrumentation does not meet the requirements of § 111.111(a)(1)(D), or the vent stream does not qualify for the exemption in § 111.111(a)(3).</p> <p>Construction Date = After January 31, 1972</p> <p>Effluent Flow Rate = Effluent flow rate is at least 100,000 actual cubic feet per minute.</p>
14STK001	30 TAC Chapter	R1111-1	Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.

Unit ID	Regulation	Index Number	Basis of Determination*
	111, Visible Emissions		<p>Vent Source = The source of the vent is not a steam generator fired by solid fossil fuel, oil or a mixture of oil and gas and is not a catalyst regenerator for a fluid bed catalytic cracking unit.</p> <p>Opacity Monitoring System = Optical instrument capable of measuring the opacity of emissions is not installed in the vent or optical instrumentation does not meet the requirements of § 111.111(a)(1)(D), or the vent stream does not qualify for the exemption in § 111.111(a)(3).</p> <p>Construction Date = After January 31, 1972</p> <p>Effluent Flow Rate = Effluent flow rate is at least 100,000 actual cubic feet per minute.</p>
14STK002	30 TAC Chapter 111, Visible Emissions	R1111-1	<p>Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.</p> <p>Vent Source = The source of the vent is not a steam generator fired by solid fossil fuel, oil or a mixture of oil and gas and is not a catalyst regenerator for a fluid bed catalytic cracking unit.</p> <p>Opacity Monitoring System = Optical instrument capable of measuring the opacity of emissions is not installed in the vent or optical instrumentation does not meet the requirements of § 111.111(a)(1)(D), or the vent stream does not qualify for the exemption in § 111.111(a)(3).</p> <p>Construction Date = After January 31, 1972</p> <p>Effluent Flow Rate = Effluent flow rate is less than 100,000 actual cubic feet per minute.</p>
15STK-005	30 TAC Chapter 111, Visible Emissions	R1111-1	<p>Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.</p> <p>Vent Source = The source of the vent is not a steam generator fired by solid fossil fuel, oil or a mixture of oil and gas and is not a catalyst regenerator for a fluid bed catalytic cracking unit.</p> <p>Opacity Monitoring System = A continuous emissions monitoring system (CEMS) capable of measuring the opacity of emissions is installed in the vent in accordance with 30 TAC § 111.111(a)(1)(C).</p> <p>Construction Date = On or before January 31, 1972</p> <p>Effluent Flow Rate = Effluent flow rate is at least 100,000 actual cubic feet per minute.</p>
15STK-006	30 TAC Chapter 111, Nonagricultural Processes	R1-151	<p>Effective Stack Height = The effective stack height as calculated in the equation specified by 30 TAC §111.151(c) is not less than the standard effective stack height as determined by Table 2 specified in 30 TAC §111.151(b).</p>
15STK-006	30 TAC Chapter 111, Visible Emissions	R1111-1	<p>Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.</p> <p>Vent Source = The source of the vent is not a steam generator fired by solid fossil fuel, oil or a mixture of oil and gas and is not a catalyst regenerator for a fluid bed catalytic cracking unit.</p> <p>Opacity Monitoring System = A continuous emissions monitoring system (CEMS) capable of measuring the opacity of emissions is installed in the vent in accordance with 30 TAC § 111.111(a)(1)(C).</p> <p>Construction Date = After January 31, 1972</p> <p>Effluent Flow Rate = Effluent flow rate is at least 100,000 actual cubic feet per minute.</p>
17STK007	30 TAC Chapter 111, Visible Emissions	R1111-1	<p>Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.</p> <p>Vent Source = The source of the vent is not a steam generator fired by solid fossil fuel, oil or a mixture of oil and gas and is not a catalyst regenerator for a fluid bed catalytic cracking unit.</p> <p>Opacity Monitoring System = A continuous emissions monitoring system (CEMS) capable of measuring the opacity of emissions is installed in the vent in accordance with 30 TAC § 111.111(a)(1)(C).</p> <p>Construction Date = After January 31, 1972</p> <p>Effluent Flow Rate = Effluent flow rate is at least 100,000 actual cubic feet per minute.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
14PRC	30 TAC Chapter 117, Nitric Acid Man.-Gen.	R7451	NONATTAINMENT AREA LOCATION [REG VII] = NOT LOCATED IN APPLICABLE OZONE NONATTAINMENT AREA
14PRC	40 CFR Part 60, Subpart G	60G	40 CFR 60 (NSPS) SUBPART G CONSTRUCTION/MODIFICATION (RECONSTRUCTION) DATE = AFTER AUGUST 17 1971
12CAD001	40 CFR Part 61, Subpart FF	61FF-1	Unit Type = Container CLOSED VENT SYSTEM AND CONTROL DEVICE AMOC = Complying with the requirements of § 61.349 By-pass Line = System does not contain by-pass lines Control Device Type/Operation = Carbon adsorption system that does not regenerate the carbon bed directly in the control device. Engineering Calculations = Engineering calculations show that the control device is proven to achieve its emission limitation. Carbon Replacement Interval = Carbon adsorber is monitored and carbon replaced on indication of breakthrough.
15CAD001	40 CFR Part 61, Subpart FF	61FF-1	Unit Type = Container CLOSED VENT SYSTEM AND CONTROL DEVICE AMOC = Complying with the requirements of § 61.349 By-pass Line = System does not contain by-pass lines Control Device Type/Operation = Carbon adsorption system that does not regenerate the carbon bed directly in the control device. Engineering Calculations = Engineering calculations show that the control device is proven to achieve its emission limitation. Carbon Replacement Interval = Carbon adsorber is monitored and carbon replaced on indication of breakthrough.
TS17TFX009	40 CFR Part 63, Subpart DD	63DD-1	SUBJECT TO ANOTHER SUBPART OF 40 CFR PART 61 OR 63 = THE TRANSFER SYSTEM IS CONTROLLING HAP UNDER THE PROVISIONS OF 40 CFR PART 63, SUBPART DD. HAP < 1MG PER YEAR = THE TRANSFER SYSTEM IS NOT SELECTED FOR EXEMPTION OR DOES NOT QUALIFY FOR THE EXEMPTION IN § 63.683(B)(2)(II). NUMERICAL CONCENTRATION LIMITS = THE TRANSFER SYSTEM IS NOT EXEMPT UNDER THE NUMERICAL CONCENTRATION LIMITS OF 40 CFR PART 268, LAND DISPOSAL RESTRICTIONS. TREATEDDD ORGANIC HAZARDOUS CONSTITUENTS = ORGANIC HAZARDOUS CONSTITUENTS ARE TREATED ACCORDING TO 40 CFR PART 63, SUBPART DD AIR EMISSION CONTROLS = THE VOHAP CONCENTRATION HAS NOT BEEN DETERMINED TO BE LESS THAN 500 PPMW AND AIR EMISSIONS ARE CONTROLLED. COVERS USED = COVERS ARE NOT USED TO CONTROL AIR EMISSIONS. CONTINUOUS HARD PIPING = THE TRANSFER SYSTEM CONSISTS OF CONTINUOUS HARD PIPING.
15BLR001	40 CFR Part 61, Subpart FF	61FF-1	AMOC = An alternate means of compliance (AMOC) to meet the requirements of 40 CFR § 61.348 for treatment processes is not used. Complying with § 61.342(e) = The facility is not complying with 40 CFR § 61.342(e). Stream Combination = The process wastewater, product tank drawdown, or landfill leachate is not combined with other waste streams for the purpose of facilitating management or treatment in the wastewater treatment system. Benzene Removal = Benzene is destroyed in the waste stream by incinerating in a combustion unit with a destruction efficiency of 99% or greater for benzene. Process Or Stream Exemption = The treatment process or waste stream is complying with 40 CFR §61.348(d).
15BLR002	40 CFR Part 61, Subpart FF	61FF-1	AMOC = An alternate means of compliance (AMOC) to meet the requirements of 40 CFR § 61.348 for treatment processes is not used. Complying with § 61.342(e) = The facility is not complying with 40 CFR § 61.342(e).

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>Stream Combination = The process wastewater, product tank drawdown, or landfill leachate is not combined with other waste streams for the purpose of facilitating management or treatment in the wastewater treatment system.</p> <p>Benzene Removal = Benzene is destroyed in the waste stream by incinerating in an combustion unit with a destruction efficiency of 99% or greater for benzene.</p> <p>Process Or Stream Exemption = The treatment process or waste stream is complying with 40 CFR §61.348(d).</p>
15BLR003	40 CFR Part 61, Subpart FF	61FF-1	<p>AMOC = An alternate means of compliance (AMOC) to meet the requirements of 40 CFR § 61.348 for treatment processes is not used.</p> <p>Complying with § 61.342(e) = The facility is not complying with 40 CFR § 61.342(e).</p> <p>Stream Combination = The process wastewater, product tank drawdown, or landfill leachate is not combined with other waste streams for the purpose of facilitating management or treatment in the wastewater treatment system.</p> <p>Benzene Removal = Benzene is destroyed in the waste stream by incinerating in an combustion unit with a destruction efficiency of 99% or greater for benzene.</p> <p>Process Or Stream Exemption = The treatment process or waste stream is complying with 40 CFR §61.348(d).</p>
15BLR004	40 CFR Part 61, Subpart FF	61FF-1	<p>AMOC = An alternate means of compliance (AMOC) to meet the requirements of 40 CFR § 61.348 for treatment processes is not used.</p> <p>Complying with § 61.342(e) = The facility is not complying with 40 CFR § 61.342(e).</p> <p>Stream Combination = The process wastewater, product tank drawdown, or landfill leachate is not combined with other waste streams for the purpose of facilitating management or treatment in the wastewater treatment system.</p> <p>Benzene Removal = Benzene is destroyed in the waste stream by incinerating in an combustion unit with a destruction efficiency of 99% or greater for benzene.</p> <p>Process Or Stream Exemption = The treatment process or waste stream is complying with 40 CFR §61.348(d).</p>
17BLR007	40 CFR Part 61, Subpart FF	61FF-1	<p>AMOC = An alternate means of compliance (AMOC) to meet the requirements of 40 CFR § 61.348 for treatment processes is not used.</p> <p>Complying with § 61.342(e) = The facility is not complying with 40 CFR § 61.342(e).</p> <p>Stream Combination = The process wastewater, product tank drawdown, or landfill leachate is not combined with other waste streams for the purpose of facilitating management or treatment in the wastewater treatment system.</p> <p>Benzene Removal = Benzene is destroyed in the waste stream by incinerating in an combustion unit with a destruction efficiency of 99% or greater for benzene.</p> <p>Process Or Stream Exemption = The treatment process or waste stream is complying with 40 CFR §61.348(d).</p>
17BLR008	40 CFR Part 61, Subpart FF	61FF-1	<p>AMOC = An alternate means of compliance (AMOC) to meet the requirements of 40 CFR § 61.348 for treatment processes is not used.</p> <p>Complying with § 61.342(e) = The facility is not complying with 40 CFR § 61.342(e).</p> <p>Stream Combination = The process wastewater, product tank drawdown, or landfill leachate is not combined with other waste streams for the purpose of facilitating management or treatment in the wastewater treatment system.</p> <p>Benzene Removal = Benzene is destroyed in the waste stream by incinerating in an combustion unit with a destruction efficiency of 99% or greater for benzene.</p> <p>Process Or Stream Exemption = The treatment process or waste stream is complying with 40 CFR §61.348(d).</p>

\* - The "unit attributes" or operating conditions that determine what requirements apply



## NSR Versus Title V FOP

The state of Texas has two Air permitting programs, New Source Review (NSR) and Title V Federal Operating Permits. The two programs are substantially different both in intent and permit content.

NSR is a preconstruction permitting program authorized by the Texas Clean Air Act and Title I of the Federal Clean Air Act (FCAA). The processing of these permits is governed by 30 Texas Administrative Code (TAC) Chapter 116.111. The Title V Federal Operating Program is a federal program authorized under Title V of the FCAA that has been delegated to the state of Texas to administer and is governed by 30 TAC Chapter 122. The major differences between the two permitting programs are listed in the table below:

NSR Permit	Federal Operating Permit(FOP)
Issued Prior to new Construction or modification of an existing facility	For initial permit with application shield, can be issued after operation commences; significant revisions require approval prior to operation.
Authorizes air emissions	Codifies existing applicable requirements, does not authorize new emissions
Ensures issued permits are protective of the environment and human health by conducting a health effects review and that requirement for best available control technology (BACT) is implemented.	Applicable requirements listed in permit are used by the inspectors to ensure proper operation of the site as authorized. Ensures that adequate monitoring is in place to allow compliance determination with the FOP.
Up to two Public notices may be required. Opportunity for public comment and contested case hearings for some authorizations.	One public notice required. Opportunity for public comments. No contested case hearings.
Applies to all point source emissions in the state.	Applies to all major sources and some non-major sources identified by the EPA.
Applies to facilities: a portion of site or individual emission sources	One or multiple FOPs cover the entire site (consists of multiple facilities)
Permits include terms and conditions under which the applicant must construct and operate its various equipment and processes on a facility basis.	Permits include terms and conditions that specify the general operational requirements of the site; and also include codification of all applicable requirements for emission units at the site.
Opportunity for EPA review for Federal Prevention of Significant Deterioration (PSD) and Nonattainment (NA) permits for major sources.	Opportunity for EPA review, Affected states review, and a Public petition period for every FOP.
Permits have a table listing maximum emission limits for pollutants	Permit has an applicable requirements table and Periodic Monitoring (PM) / Compliance Assurance Monitoring (CAM) tables which document applicable monitoring requirements.
Permits can be altered or amended upon application by company. Permits must be issued before construction or modification of facilities can begin.	Permits can be revised through several revision processes, which provide for different levels of public notice and opportunity to comment. Changes that would be significant revisions require that a revised permit be issued before those changes can be operated.
NSR permits are issued independent of FOP requirements.	FOP are independent of NSR permits, but contain a list of all NSR permits incorporated by reference

## New Source Review Requirements

Below is a list of the New Source Review (NSR) permits for the permitted area. These NSR permits are incorporated by reference into the operating permit and are enforceable under it. These permits can be found in the main TCEQ file room, located on the first floor of Building E, 12100 Park 35 Circle, Austin, Texas. The Public Education Program may be contacted at 1-800-687-4040 or the Air Permits Division (APD) may be contacted at 1-512-239-1250 for help with any question.

Effective May 1, 2011, the Environmental Protection Agency became the permitting authority for, and began applying the Federal PSD requirements to, large GHG-emitting sources in accordance with the thresholds established under the Tailoring Rule. (76 *Fed. Reg.* 25178, May 3, 2011). EPA has issued permits to several major GHG sources in Texas before transferring authority to Texas effective November 10, 2014.

TCEQ amended the definition of 'applicable requirement' in 30 TAC Chapter 122, § 122.10(2) to add EPA issued PSD permits for GHG emissions at Title V sites. This rule change became effective April 17, 2014, and the NSR authorizations incorporated below are enforceable by EPA and TCEQ.

Additionally, the site contains emission units that are permitted by rule under the requirements of 30 TAC Chapter 106, Permits by Rule. The following table specifies the permits by rule that apply to the site. All current permits by rule are contained in Chapter 106. Outdated 30 TAC Chapter 106 permits by rule may be viewed at the following Web site:

[www.tceq.texas.gov/permitting/air/permitbyrule/historical\\_rules/old106list/index106.html](http://www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/old106list/index106.html)

Outdated Standard Exemption lists may be viewed at the following Web site:

[www.tceq.texas.gov/permitting/air/permitbyrule/historical\\_rules/oldselist/se\\_index.html](http://www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/oldselist/se_index.html)

Prevention of Significant Deterioration (PSD) Permit for GHG Emissions	
PSD Permit No.: PSD-TX-812-GHG	Issuance Date: 05/14/2013
Title 30 TAC Chapter 116 Permits, Special Permits, and Other Authorizations (Other Than Permits By Rule, PSD Permits, or NA Permits) for the Application Area.	
Authorization No.: 23271	Issuance Date: 04/26/2012
Authorization No.: 809	Issuance Date: 01/31/2011
Authorization No.: 812	Issuance Date: 04/26/2013
Authorization No.: 813	Issuance Date: 01/12/2012
Authorization No.: 9560	Issuance Date: 05/16/2012
Permits By Rule (30 TAC Chapter 106) for the Application Area	
Number: 106.261	Version No./Date: 12/24/1998
Number: 106.261	Version No./Date: 11/01/2003
Number: 106.262	Version No./Date: 12/24/1998
Number: 106.262	Version No./Date: 11/01/2003
Number: 106.263	Version No./Date: 11/01/2001
Number: 106.371	Version No./Date: 09/04/2000

Number: 106.472	Version No./Date: 09/04/2000
Number: 106.476	Version No./Date: 09/04/2000
Number: 106.478	Version No./Date: 03/14/1997
Number: 106.511	Version No./Date: 09/04/2000

## **Emission Units and Emission Points**

In air permitting terminology, any source capable of generating emissions (for example, an engine or a sandblasting area) is called an Emission Unit. For purposes of Title V, emission units are specifically listed in the operating permit when they have applicable requirements other than New Source Review (NSR), or when they are listed in the permit shield table.

The actual physical location where the emissions enter the atmosphere (for example, an engine stack or a sandblasting yard) is called an emission point. For New Source Review preconstruction permitting purposes, every emission unit has an associated emission point. Emission limits are listed in an NSR permit, associated with an emission point. This list of emission points and emission limits per pollutant is commonly referred to as the “Maximum Allowable Emission Rate Table”, or “MAERT” for short. Specifically, the MAERT lists the Emission Point Number (EPN) that identifies the emission point, followed immediately by the Source Name, identifying the emission unit that is the source of those emissions on this table.

Thus, by reference, an emission unit in a Title V operating permit is linked by reference number to an NSR authorization, and its related emission point.

## **Monitoring Sufficiency**

Federal and state rules, 40 CFR § 70.6(a)(3)(i)(B) and 30 TAC § 122.142(c) respectively, require that each federal operating permit include additional monitoring for applicable requirements that lack periodic or instrumental monitoring (which may include recordkeeping that serves as monitoring) that yields reliable data from a relevant time period that are representative of the emission unit’s compliance with the applicable emission limitation or standard. Furthermore, the federal operating permit must include compliance assurance monitoring (CAM) requirements for emission sources that meet the applicability criteria of 40 CFR Part 64 in accordance with 40 CFR § 70.6(a)(3)(i)(A) and 30 TAC § 122.604(b).

With the exception of any emission units listed in the Periodic Monitoring or CAM Summaries in the FOP, the TCEQ Executive Director has determined that the permit contains sufficient monitoring, testing, recordkeeping, and reporting requirements that assure compliance with the applicable requirements. If applicable, each emission unit that requires additional monitoring in the form of periodic monitoring or CAM is described in further detail under the Rationale for CAM/PM Methods Selected section following this paragraph.

## Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected

### Periodic Monitoring:

The Federal Clean Air Act requires that each federal operating permit include monitoring sufficient to assure compliance with the terms and conditions of the permit. Most of the emission limits and standards applicable to emission units at Title V sources include adequate monitoring to show that the units meet the limits and standards. For those requirements that do not include monitoring, or where the monitoring is not sufficient to assure compliance, the federal operating permit must include such monitoring for the emission units affected. The following emission units are subject to periodic monitoring requirements because the emission units are subject to an emission limitation or standard for an air pollutant (or surrogate thereof) in an applicable requirement that does not already require monitoring, or the monitoring for the applicable requirement is not sufficient to assure compliance:

Unit/Group/Process Information	
ID No.: 12BLR001	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 111, Visible Emissions	SOP Index No.: R1111-1
Pollutant: OPACITY	Main Standard: § 111.111(a)(1)(C)
Monitoring Information	
Indicator: Fuel Type	
Minimum Frequency: Annually	
Averaging Period: n/a	
Deviation Limit: Record the type of fuel used by the unit. If an alternate fuel is fired, either alone or in combination with the specified gas, it shall be considered and reported as a deviation.	
Basis of monitoring: Industry has demonstrated through performance tests and historical data that opacity and particulate matter standards are consistently met when combustion units fire natural gas only.	

Unit/Group/Process Information	
ID No.: 14PRC	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart G	SOP Index No.: 60G
Pollutant: OPACITY	Main Standard: § 60.72(a)(2)
Monitoring Information	
Indicator: Opacity	
Minimum Frequency: Once per month	
Averaging Period: Six-minutes	
Deviation Limit: Maximum Opacity = 10%	
<p>Basis of monitoring:</p> <p>The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Opacity and visible emissions have been used as an indicator of particulate emissions in many federal rules including 40 CFR Part 60, Subpart F and Subpart HH. In addition, use of these indicators is consistent with the EPA's "Compliance Assurance Monitoring (CAM) Technical Guidance Document" (August 1998). Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations and the requirements of 40 CFR § 60.13 for a continuous opacity monitoring system (COMS). The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.</p>	

Unit/Group/Process Information	
ID No.: 14STK001	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 111, Visible Emissions	SOP Index No.: R1111-1
Pollutant: OPACITY	Main Standard: § 111.111(a)(1)(C)
Monitoring Information	
Indicator: Visible Emissions	
Minimum Frequency: once per calendar quarter	
Averaging Period: n/a	
Deviation Limit: No visible emissions. If visible emissions are observed the permit holder shall either report a deviation or determine opacity consistent with Test Method 22 or Test Method 9. Opacity shall not exceed 15% averaged over a six-minute period.	
Basis of monitoring: Industry has demonstrated through performance tests and historical data that opacity and particulate matter standards are consistently met when combustion units fire natural gas only.	

<b>Unit/Group/Process Information</b>	
ID No.: 14STK002	
Control Device ID No.: N/A	Control Device Type: N/A
<b>Applicable Regulatory Requirement</b>	
Name: 30 TAC Chapter 111, Visible Emissions	SOP Index No.: R1111-1
Pollutant: OPACITY	Main Standard: § 111.111(a)(1)(B)
<b>Monitoring Information</b>	
Indicator: Visible Emissions	
Minimum Frequency: once per calendar quarter	
Averaging Period: n/a	
Deviation Limit: No visible emissions. If visible emissions are observed the permit holder shall either report a deviation or determine opacity consistent with Test Method 22 or Test Method 9. Opacity shall not exceed 20% averaged over a six-minute period.	
Basis of monitoring: Industry has demonstrated through performance tests and historical data that opacity and particulate matter standards are consistently met when combustion units fire natural gas only.	

Unit/Group/Process Information	
ID No.: 15BLR004	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart D	SOP Index No.: 60D-1
Pollutant: PM	Main Standard: § 60.42(a)(1)
Monitoring Information	
Indicator: Opacity	
Minimum Frequency: Six times per minute	
Averaging Period: Six minutes	
Deviation Limit: Exhibit greater than 20% opacity except for one six minute period per hour not greater than 27% opacity.	
<p>Basis of monitoring:</p> <p>The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Opacity and visible emissions have been used as an indicator of particulate emissions in many federal rules including 40 CFR Part 60, Subpart F and Subpart HH. In addition, use of these indicators is consistent with the EPA's "Compliance Assurance Monitoring (CAM) Technical Guidance Document" (August 1998). Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations and the requirements of 40 CFR § 60.13 for a continuous opacity monitoring system (COMS). The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.</p>	



Unit/Group/Process Information	
ID No.: 15STK-006	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 111, Nonagricultural Processes	SOP Index No.: R1-151
Pollutant: PM	Main Standard: § 111.151(a)
Monitoring Information	
Indicator: PM Emission Rate	
Minimum Frequency: Once per month	
Averaging Period: hourly	
Deviation Limit: A particulate matter (PM) emission rate greater than 154.5 lb/hr at maximum firing rates. At less than maximum firing rates, a PM emission rate greater than the limit that is determined from the equations in 30 TAC 111.151.	
<p>Basis of monitoring:</p> <p>Measure and record the liquid flow rate and gas flow rate. Establish a minimum liquid-to-gas ratio using the most recent performance test, manufacturer's recommendations, engineering calculations, and/or historical data. The monitoring instrumentation shall be calibrated, maintained, and operated in accordance with manufacturer's specifications or other written procedures. Any monitoring data below the minimum limit shall be considered and reported as a deviation.</p>	

Unit/Group/Process Information	
ID No.: 17BLR007	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart D	SOP Index No.: 60D-1
Pollutant: PM	Main Standard: § 60.42(a)(1)
Monitoring Information	
Indicator: Opacity	
Minimum Frequency: Six times per minute	
Averaging Period: Six minutes	
Deviation Limit: Exhibit greater than 20% opacity, except for one six minute period per hour not greater than 27% opacity, during periods when (1) neither boiler is in startup, shutdown, or malfunction mode and (2) 100% gaseous fossil fuel is the only fuel being fired in either boiler.	
<p>Basis of monitoring:</p> <p>The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Opacity and visible emissions have been used as an indicator of particulate emissions in many federal rules including 40 CFR Part 60, Subpart F and Subpart HH. In addition, use of these indicators is consistent with the EPA's "Compliance Assurance Monitoring (CAM) Technical Guidance Document" (August 1998). Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations and the requirements of 40 CFR § 60.13 for a continuous opacity monitoring system (COMS). The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.</p>	

Unit/Group/Process Information	
ID No.: 17BLR007	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart D	SOP Index No.: 60D-1
Pollutant: NO <sub>x</sub>	Main Standard: § 60.44(a)(1)
Monitoring Information	
Indicator: NO <sub>x</sub> Concentration	
Minimum Frequency: Quarterly, provided the boiler operates at least 180 hours on 100% fossil fuels during the quarter	
Averaging Period: N/A	
Deviation Limit: Greater than 86 ng/J heat input (0.20 lb/MMBtu) while firing 100% gaseous fossil fuel.	
<p>Basis of monitoring: It is widely practiced and accepted to calibrate and use a portable analyzer or NO<sub>x</sub> CEMS PEMS to measure NO<sub>x</sub> concentration with procedures such as EPA Test Method 7. The measured concentration along with the stack flow rate or AP-42 factors and fuel consumption records may be used to demonstrate compliance with an underlying emission limit or standard. Additionally, measuring NO<sub>x</sub> concentration is provided as a monitoring option for any control device because an increase in NO<sub>x</sub> concentration may be indicative of the control device performance. Outlet NO<sub>x</sub> concentration has been used as an indicator in many federal and state rules.</p> <p>The monitoring frequency of 180 hours of 100% fossil fuel usage during a calendar quarter was defined. The 180 hours was negotiated between INVISTA and the TCEQ permit engineer. The periods of fossil fuel burning are usually brief, consisting of maybe a few hours at a time. The intent behind the 180 hours monitoring frequency was to allow enough time to schedule monitoring. It was concluded that one week (rounded up to 180 hours) was sufficient time to either be able to schedule monitoring, or have to have sufficient instances to monitor according to the periodic monitoring requirement. Any time period less than 180 hours was determined as insufficient time to conduct the required monitoring.</p>	

Unit/Group/Process Information	
ID No.: 17BLR008	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart D	SOP Index No.: 60D-1
Pollutant: PM	Main Standard: § 60.42(a)(1)
Monitoring Information	
Indicator: Opacity	
Minimum Frequency: Six times per minute	
Averaging Period: Six minutes	
Deviation Limit: Exhibit greater than 20% opacity, except for one six minute period per hour not greater than 27% opacity, during periods when (1) neither boiler is in startup, shutdown, or malfunction mode and (2) 100% gaseous fossil fuel is the only fuel being fired in either boiler.	
<p>Basis of monitoring:</p> <p>The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Opacity and visible emissions have been used as an indicator of particulate emissions in many federal rules including 40 CFR Part 60, Subpart F and Subpart HH. In addition, use of these indicators is consistent with the EPA's "Compliance Assurance Monitoring (CAM) Technical Guidance Document" (August 1998). Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations and the requirements of 40 CFR § 60.13 for a continuous opacity monitoring system (COMS). The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.</p>	

Unit/Group/Process Information	
ID No.: 17BLR008	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart D	SOP Index No.: 60D-1
Pollutant: NO <sub>x</sub>	Main Standard: § 60.44(a)(1)
Monitoring Information	
Indicator: NO <sub>x</sub> Concentration	
Minimum Frequency: Quarterly, provided the boiler operates at least 180 hours on 100% fossil fuels during the quarter	
Averaging Period: N/A	
Deviation Limit: Greater than 86 ng/J heat input (0.20 lb/MMBtu) while firing 100% gaseous fossil fuel	
<p>Basis of monitoring: It is widely practiced and accepted to calibrate and use a portable analyzer or NO<sub>x</sub> CEMS PEMS to measure NO<sub>x</sub> concentration with procedures such as EPA Test Method 7. The measured concentration along with the stack flow rate or AP-42 factors and fuel consumption records may be used to demonstrate compliance with an underlying emission limit or standard. Additionally, measuring NO<sub>x</sub> concentration is provided as a monitoring option for any control device because an increase in NO<sub>x</sub> concentration may be indicative of the control device performance. Outlet NO<sub>x</sub> concentration has been used as an indicator in many federal and state rules.</p> <p>The monitoring frequency of 180 hours of 100% fossil fuel usage during a calendar quarter was defined. The 180 hours was negotiated between INVISTA and the TCEQ permit engineer. The periods of fossil fuel burning are usually brief, consisting of maybe a few hours at a time. The intent behind the 180 hours monitoring frequency was to allow enough time to schedule monitoring. It was concluded that one week (rounded up to 180 hours) was sufficient time to either be able to schedule monitoring, or have to have sufficient instances to monitor according to the periodic monitoring requirement. Any time period less than 180 hours was determined as insufficient time to conduct the required monitoring.</p>	

Unit/Group/Process Information	
ID No.: 17TFX008	
Control Device ID No.: 04FLR032	Control Device Type: Flare
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R5112-2
Pollutant: VOC	Main Standard: § 115.112(b)(1)
Monitoring Information	
Indicator: Pilot Flame	
Minimum Frequency: Once per hour	
Averaging Period: n/a	
<p>Deviation Limit: Lack of pilot flame in which a manual relight of flare 04FLR032 is required. Any monitoring data indicating lack of a pilot flame shall be considered and reported as a deviation unless there is a record of a visual confirmation of a flame and no relight was required except for times in which 17TFX008 is empty and out of service.</p>	
<p>Basis of monitoring:  It is widely practiced and accepted to monitor the flare pilot flame by closed circuit cameras, thermocouples and visual inspection. The presence of the pilot flame demonstrates that VOC emissions are combusted. Monitoring the presence of a pilot flame is required in many federal rules, including: 40 CFR Part 60, Subparts K, III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; and 40 CFR Part 63, Subparts G, R, W, DD, and HH.</p>	

<b>Unit/Group/Process Information</b>	
ID No.: 17TFX009	
Control Device ID No.: 04FLR032	Control Device Type: Flare
<b>Applicable Regulatory Requirement</b>	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R5112-2
Pollutant: VOC	Main Standard: § 115.112(b)(1)
<b>Monitoring Information</b>	
Indicator: Pilot Flame	
Minimum Frequency: Once per hour	
Averaging Period: n/a	
Deviation Limit: Lack of pilot flame in which a manual relight of flare 04FLR032 is required. Any monitoring data indicating lack of a pilot flame shall be considered and reported as a deviation unless there is a record of a visual confirmation of a flame and no relight was required except for times in which 17TFX008 is empty and out of service.	
Basis of monitoring: It is widely practiced and accepted to monitor the flare pilot flame by closed circuit cameras, thermocouples and visual inspection. The presence of the pilot flame demonstrates that VOC emissions are combusted. Monitoring the presence of a pilot flame is required in many federal rules, including: 40 CFR Part 60, Subparts K, III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; and 40 CFR Part 63, Subparts G, R, W, DD, and HH.	

## Compliance Assurance Monitoring (CAM):

Compliance Assurance Monitoring (CAM) is a federal monitoring program established under Title 40 Code of Federal Regulations Part 64 (40 CFR Part 64).

Emission units are subject to CAM requirements if they meet the following criteria:

1. the emission unit is subject to an emission limitation or standard for an air pollutant (or surrogate thereof) in an applicable requirement;
2. the emission unit uses a control device to achieve compliance with the emission limitation or standard specified in the applicable requirement; and
3. the emission unit has the pre-control device potential to emit greater than or equal to the amount in tons per year for a site to be classified as a major source.

The following table(s) identify the emission unit(s) that are subject to CAM:

Unit/Group/Process Information	
ID No.: 14PRC	
Control Device ID No.: 14STK001	Control Device Type: Selective Catalytic Reduction (SCR)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 117, Nitric Acid Man.-Gen.	SOP Index No.: R7451
Pollutant: NO <sub>x</sub>	Main Standard: 117.4205
Monitoring Information	
Indicator: Nitrogen Oxides Concentration	
Minimum Frequency: four times per hour	
Averaging Period: one hour	
Deviation Limit: Maximum concentration in exhaust of 600 parts per million by volume, calculated as nitrogen dioxide.	
Basis of CAM: It is widely practiced and accepted to calibrate and use a portable analyzer or NO <sub>x</sub> CEMS/PEMS to measure NO <sub>x</sub> concentration with procedures such as EPA Test Method 7. The measured concentration along with stack flow rate or AP-42 factors and fuel consumption records may be used to demonstrate compliance with an underlying emission limit or standard. Additionally, measuring the NO <sub>x</sub> concentration is provided as a monitoring option for any control device because an increase in NO <sub>x</sub> concentration may be indicative of the control device performance. Outlet NO <sub>x</sub> concentration has been used as an indicator in many federal and state rules.	



Unit/Group/Process Information	
ID No.: 14PRC	
Control Device ID No.: 14STK001	Control Device Type: Selective Non-Catalytic Reduction (SNCR)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 117, Nitric Acid Man.-Gen.	SOP Index No.: R7451
Pollutant: NOX	Main Standard: 117.4205
Monitoring Information	
Indicator: Nitrogen Oxides Concentration	
Minimum Frequency: four times per hour	
Averaging Period: one hour	
Deviation Limit: Maximum concentration in exhaust of 600 parts per million by volume, calculated as nitrogen dioxide.	
Basis of CAM: It is widely practiced and accepted to calibrate and use a portable analyzer or NOx CEMS/PEMS to measure NOx concentration with procedures such as EPA Test Method 7. The measured concentration along with stack flow rate or AP-42 factors and fuel consumption records may be used to demonstrate compliance with an underlying emission limit or standard. Additionally, measuring the NOx concentration is provided as a monitoring option for any control device because an increase in NOx concentration may be indicative of the control device performance. Outlet NOx concentration has been used as an indicator in many federal and state rules.	

Unit/Group/Process Information	
ID No.: 15BLR001	
Control Device ID No.: 15STK-005	Control Device Type: Selective Non-Catalytic Reduction (SNCR)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 116, NSR Permits	SOP Index No.: R6-812
Pollutant: NOX	Main Standard: § 116.116(b)
Monitoring Information	
Indicator: Nitrogen Oxides Concentration	
Minimum Frequency: four times per hour	
Averaging Period: one hour	
Deviation Limit: The maximum nitrogen oxides (NOx) rates of 4,658 lb/hr and 3,809 tpy as specified in NSR Permit Number 812 for EPN 15STK-005.	
Basis of CAM: It is widely practiced and accepted to calibrate and use a portable analyzer or NOx CEMS/PEMS to measure NOx concentration with procedures such as EPA Test Method 7. The measured concentration along with stack flow rate or AP-42 factors and fuel consumption records may be used to demonstrate compliance with an underlying emission limit or standard. Additionally, measuring the NOx concentration is provided as a monitoring option for any control device because an increase in NOx concentration may be indicative of the control device performance. Outlet NOx concentration has been used as an indicator in many federal and state rules.	

Unit/Group/Process Information	
ID No.: 15BLR002	
Control Device ID No.: 15STK-005	Control Device Type: Selective Non-Catalytic Reduction (SNCR)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 116, NSR Permits	SOP Index No.: R6-812
Pollutant: NOX	Main Standard: § 116.116(b)
Monitoring Information	
Indicator: Nitrogen Oxides Concentration	
Minimum Frequency: four times per hour	
Averaging Period: one hour	
Deviation Limit: The maximum nitrogen oxides (NOx) rates of 4,658 lb/hr and 3,809 tpy as specified in NSR Permit Number 812 for EPN 15STK-005.	
Basis of CAM: It is widely practiced and accepted to calibrate and use a portable analyzer or NOx CEMS/PEMS to measure NOx concentration with procedures such as EPA Test Method 7. The measured concentration along with stack flow rate or AP-42 factors and fuel consumption records may be used to demonstrate compliance with an underlying emission limit or standard. Additionally, measuring the NOx concentration is provided as a monitoring option for any control device because an increase in NOx concentration may be indicative of the control device performance. Outlet NOx concentration has been used as an indicator in many federal and state rules.	

Unit/Group/Process Information	
ID No.: 15BLR003	
Control Device ID No.: 15STK-006	Control Device Type: Selective Non-Catalytic Reduction (SNCR)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 116, NSR Permits	SOP Index No.: R6-812
Pollutant: NOX	Main Standard: § 116.116(b)
Monitoring Information	
Indicator: Nitrogen Oxides Concentration	
Minimum Frequency: four times per hour	
Averaging Period: one hour	
Deviation Limit: The maximum nitrogen oxides (NOx) rates of 4,658 lb/hr and 3,809 tpy as specified in NSR Permit Number 812 for EPN 15STK-006.	
Basis of CAM: It is widely practiced and accepted to calibrate and use a portable analyzer or NOx CEMS/PEMS to measure NOx concentration with procedures such as EPA Test Method 7. The measured concentration along with stack flow rate or AP-42 factors and fuel consumption records may be used to demonstrate compliance with an underlying emission limit or standard. Additionally, measuring the NOx concentration is provided as a monitoring option for any control device because an increase in NOx concentration may be indicative of the control device performance. Outlet NOx concentration has been used as an indicator in many federal and state rules.	

Unit/Group/Process Information	
ID No.: 15BLR004	
Control Device ID No.: 15STK-006	Control Device Type: Selective Non-Catalytic Reduction (SNCR)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 116, NSR Permits	SOP Index No.: R6-812
Pollutant: NOX	Main Standard: § 116.116(b)
Monitoring Information	
Indicator: Nitrogen Oxides Concentration	
Minimum Frequency: four times per hour	
Averaging Period: one hour	
Deviation Limit: The maximum nitrogen oxides (NOx) rates of 4,658 lb/hr and 3,809 tpy as specified in NSR Permit Number 812 for EPN 15STK-006.	
Basis of CAM: It is widely practiced and accepted to calibrate and use a portable analyzer or NOx CEMS/PEMS to measure NOx concentration with procedures such as EPA Test Method 7. The measured concentration along with stack flow rate or AP-42 factors and fuel consumption records may be used to demonstrate compliance with an underlying emission limit or standard. Additionally, measuring the NOx concentration is provided as a monitoring option for any control device because an increase in NOx concentration may be indicative of the control device performance. Outlet NOx concentration has been used as an indicator in many federal and state rules.	

Unit/Group/Process Information	
ID No.: 15FUG	
Control Device ID No.: 15STK-005	Control Device Type: Selective Non-Catalytic Reduction (SNCR)
Control Device ID No.: 15STK-006	Control Device Type: Selective Non-Catalytic Reduction (SNCR)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 116, NSR Permits	SOP Index No.: R6-812
Pollutant: NOX	Main Standard: § 116.116(b)
Monitoring Information	
Indicator: Nitrogen Oxides Concentration	
Minimum Frequency: four times per hour	
Averaging Period: one hour	
Deviation Limit: The maximum nitrogen oxides (NOx) rates of 4,658 lb/hr and 3,809 tpy as specified in NSR Permit Number 812 for EPNs 15STK-005 and 15STK-006.	
Basis of CAM: It is widely practiced and accepted to calibrate and use a portable analyzer or NOx CEMS/PEMS to measure NOx concentration with procedures such as EPA Test Method 7. The measured concentration along with stack flow rate or AP-42 factors and fuel consumption records may be used to demonstrate compliance with an underlying emission limit or standard. Additionally, measuring the NOx concentration is provided as a monitoring option for any control device because an increase in NOx concentration may be indicative of the control device performance. Outlet NOx concentration has been used as an indicator in many federal and state rules.	

## Available Unit Attribute Forms

OP-UA1 - Miscellaneous and Generic Unit Attributes  
OP-UA2 - Stationary Reciprocating Internal Combustion Engine Attributes  
OP-UA3 - Storage Tank/Vessel Attributes  
OP-UA4 - Loading/Unloading Operations Attributes  
OP-UA5 - Process Heater/Furnace Attributes  
OP-UA6 - Boiler/Steam Generator/Steam Generating Unit Attributes  
OP-UA7 - Flare Attributes  
OP-UA8 - Coal Preparation Plant Attributes  
OP-UA9 - Nonmetallic Mineral Process Plant Attributes  
OP-UA10 - Gas Sweetening/Sulfur Recovery Unit Attributes  
OP-UA11 - Stationary Turbine Attributes  
OP-UA12 - Fugitive Emission Unit Attributes  
OP-UA13 - Industrial Process Cooling Tower Attributes  
OP-UA14 - Water Separator Attributes  
OP-UA15 - Emission Point/Stationary Vent/Distillation Operation/Process Vent Attributes  
OP-UA16 - Solvent Degreasing Machine Attributes  
OP-UA17 - Distillation Unit Attributes  
OP-UA18 - Surface Coating Operations Attributes  
OP-UA19 - Wastewater Unit Attributes  
OP-UA20 - Asphalt Operations Attributes  
OP-UA21 - Grain Elevator Attributes  
OP-UA22 - Printing Attributes  
OP-UA24 - Wool Fiberglass Insulation Manufacturing Plant Attributes  
OP-UA25 - Synthetic Fiber Production Attributes  
OP-UA26 - Electroplating and Anodizing Unit Attributes  
OP-UA27 - Nitric Acid Manufacturing Attributes  
OP-UA28 - Polymer Manufacturing Attributes  
OP-UA29 - Glass Manufacturing Unit Attributes  
OP-UA30 - Kraft, Soda, Sulfite, and Stand-Alone Semicheical Pulp Mill Attributes  
OP-UA31 - Lead Smelting Attributes  
OP-UA32 - Copper and Zinc Smelting/Brass and Bronze Production Attributes  
OP-UA33 - Metallic Mineral Processing Plant Attributes  
OP-UA34 - Pharmaceutical Manufacturing  
OP-UA35 - Incinerator Attributes  
OP-UA36 - Steel Plant Unit Attributes  
OP-UA37 - Basic Oxygen Process Furnace Unit Attributes  
OP-UA38 - Lead-Acid Battery Manufacturing Plant Attributes  
OP-UA39 - Sterilization Source Attributes  
OP-UA40 - Ferroalloy Production Facility Attributes  
OP-UA41 - Dry Cleaning Facility Attributes  
OP-UA42 - Phosphate Fertilizer Manufacturing Attributes  
OP-UA43 - Sulfuric Acid Production Attributes  
OP-UA44 - Municipal Solid Waste Landfill/Waste Disposal Site Attributes  
OP-UA45 - Surface Impoundment Attributes  
OP-UA46 - Epoxy Resins and Non-Nylon Polyamides Production Attributes  
OP-UA47 - Ship Building and Ship Repair Unit Attributes  
OP-UA48 - Air Oxidation Unit Process Attributes  
OP-UA49 - Vacuum-Producing System Attributes  
OP-UA50 - Fluid Catalytic Cracking Unit Catalyst Regenerator/Fuel Gas Combustion Device/Claus Sulfur Recovery Plant Attributes

OP-UA51 - Dryer/Kiln/Oven Attributes  
OP-UA52 - Closed Vent Systems and Control Devices  
OP-UA53 - Beryllium Processing Attributes  
OP-UA54 - Mercury Chlor-Alkali Cell Attributes  
OP-UA55 - Transfer System Attributes  
OP-UA56 - Vinyl Chloride Process Attributes  
OP-UA57 - Cleaning/Depainting Operation Attributes  
OP-UA58 - Treatment Process Attributes  
OP-UA59 - Coke By-Product Recovery Plant Attributes  
OP-UA60 - Chemical Manufacturing Process Unit Attributes  
OP-UA61 - Pulp, Paper, or Paperboard Producing Process Attributes  
OP-UA62 - Glycol Dehydration Unit Attributes  
OP-UA63 - Vegetable Oil Production Attributes